

Consultation statement



City of York

LDF | Local
Development
Framework

LDF Issues and Options
Consultation Summer
2006

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**LDF Issues and Options
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N.B. Individual comments in full can be viewed at the Council Offices at 9 St Leonard's Place. Please contact the Council on 01904 551466 for further information.

1. Introduction:

- 1.1 The purpose of this report is to summarise the initial Core Strategy Issues and Options consultation, which the City of York Council undertook in Summer 2006. The responses from this initial consultation in combination with new technical work have been used to develop further options on which the Council is now consulting. The comments received as part of the consultation undertaken during summer 2006, and as part of the consultation which is currently taking place, will be used to inform the future development of the Core Strategy.
- 1.2 In Autumn 2004 the government introduced a new planning system in this country. For local authorities such as York the new system introduced a range of planning documents collectively known as the Local Development Framework (LDF). The LDF essentially comprises a 'folder' of documents designed to guide and manage development in York over the next two decades. The Core Strategy is one of the first documents that is being produced as part of the LDF, and will provide the overall planning vision and strategy for York.
- 1.3 The first step in preparing the Core Strategy is to consider the key issues and options facing York. To aid the discussion of the issues and options an initial document was produced which outlined some of the key issues facing York and possible options for addressing these. This document went out for consultation from 6th June 2006 until 21st July 2006.
- 1.4 This report outlines the different consultation documents which were produced; sets out who was consulted; outlines the methods and techniques used during the consultation, and provides a summary of the responses received.

2. Consultation Documents:

- 2.1 A number of documents were produced as part of the consultation, to inform people about what the process involved, how they could respond, and also ways in which they could contact the City Development team. These included:
- Core Strategy Issues and Options document;
 - Executive Summary Issues and Options document;
 - Sustainability Appraisal;
 - Leaflet;
 - Poster; and
 - Comments Form.
- 2.2 As well as the issues and options document itself, it was considered appropriate to prepare additional supporting material in recognition of the different groups the Council were trying to involve. Therefore the Executive Summary was produced which sought to explain what the consultation process was about, but also asked key questions under the different topic areas.
- 2.3 Furthermore, the leaflets and poster were designed to raise awareness of the consultation and the LDF in general. These were more widely distributed (as set out in paragraph 3.4) and provided a way of reaching the general public who might otherwise not get involved.
- 2.4 Prior to consultation on the Issues and Options, the document was subject to a Sustainability Appraisal (see Appendix 1). Sustainability Appraisal (SA) forms an integral part of the Local Development Framework (LDF) and will be undertaken at key stages alongside the production of each Development Plan Document (DPD). The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into policy development. The SA for the initial Core Strategy Issues and Options (Appendix 1) considers the key sustainability issues arising from the Issues and Options document. It was published in June 2006 to support the initial Issues and Options consultation.
- 2.5 There were several ways in which people and organisations could comment on the Issues and Options document. These were by:
- filling in the comments form;
 - writing to the City Development team using the address found in the documents, posters and leaflets;
 - emailing the City Development using the email address found in the documents, posters and leaflets; or
 - using the electronic comments form which could be found on the Council's website.

3. Document Distribution / Publicity:

3.1 The packs were sent out to over 500 contacts. A list of all those consulted is set out in Appendix 2. Specific consultees received packs containing:

- Consultation Letter;
- Core Strategy Issues and Options document;
- Executive Summary Issues and Options document;
- Sustainability Appraisal;
- Leaflet; and
- Comments Form.

All other contacts in Appendix 2 received packs containing:

- Consultation Letter;
- Executive Summary Issues and Options document;
- Leaflet; and
- Comments Form.

3.3 In addition to this all of the documents were made available to view on the Council's website, in the 15 City of York Council libraries (including the mobile library), and at the Council's receptions at the Guildhall and City Strategy.

Wider Distribution:

3.4 Posters and leaflets were distributed to schools, places of worship, community and leisure centres, GP surgeries and major employers. They were asked to display them where they could be viewed by the public, employees and students, as appropriate. The posters and leaflets contained information about what the consultation process was about and how to obtain further information, and gave instructions on how comments could be made.

Media:

3.5 In addition to distributing the documentation, the Council also sought to further publicise the consultation and give details on how and when comments could be made.

3.6 The Council published a press release, which resulted in two radio stations (Minster FM and BBC Radio York) requesting interviews.

3.7 The consultation also featured in five of the Council's 'Your Ward' newsletters, which are sent out to households within wards in York every 3 months. This newsletter enables the Council to contact residents with agendas for committee meetings, generic items, and other specific local issues and matters of interest. The consultation also featured within an internal newsletter called 'News and Jobs' which is published fortnightly and distributed to Council staff.

4. Consultation Events:

4.1 A timetable of all the events held as part of the consultation is outlined in Appendix 3, and further detail on each event is set out below.

Exhibitions:

4.2 The Council organised exhibitions at three locations across the City. These exhibitions were advertised in both the radio interviews and also on the Council's website. These were:

- Two exhibitions at supermarkets, one on 27th June 2006 – Askham Bar, and the other 30th June 2006 – Clifton Moor.
- Two exhibitions in the City Centre, using the mobile exhibition unit in St Sampson Square which took place on 20th and 21st June 2006.

4.3 The exhibitions involved officers answering questions and talking to the general public about the consultation. Information on the Local Development Framework (LDF) and the key issues for the Core Strategy were set out on display boards and leaflets and other consultation material were made available for people to take away.

4.4 In addition to wider consultation and awareness raising, the Council also carried out more targeted and in-depth consultation with certain groups, in the form of workshops, forums and meetings.

Workshops:

4.5 Five workshops were held over the consultation period, and formed a major part of the consultation process. The following topic areas were covered:

- Sustainable Forms of Transport held on the 28th June 2006;
- Economic Wellbeing through Sustainable Economic Growth held on the 3^d July 2006;
- Community Development Needs held on the 6th July 2006;
- Sustainable Location of Development held on the 11th July 2006; and
- A Quality Environment and Sustainable Design held on the 19th July 2006.

4.6 Each workshop started with a presentation on the LDF and the Core Strategy, and then a short presentation was given on the issues and options surrounding the specific topic. A series of key questions were presented to encourage a debate. Key people from a variety of groups were invited to the workshops including individuals representing major retail, transport and business interests, people representing local interest groups and other interested individuals. The comments from these workshops have been incorporated into the overall summary of comments set out in part 6 of this report.

Forums:

- 4.7 Officers attended a number of local forums to discuss the key issues and options within the Core Strategy. In each case, Officers presented the key topics within the document and then discussed the issues and options.
- 4.8 The largest forum was held on the 14th June 2006 when the Council was invited to a joint meeting organised by the York Professional Initiative (YPI) and the York Property Forum (YPF). These groups promote themselves as 'The voice of York professionals' and come from a range of disciplines including financial, property, architecture, and marketing. For this particular forum, after the presentations, the members of the YPI and YPF were split into groups and the issues were discussed in detail. The comments from this forum have been incorporated into an overall summary of comments received as part of the consultation. The summary is set out in part 6 of this report.
- 4.9 In addition to the above, Officers attended the following local forums:
- The 'Inclusive York Forum' (12th June 2006), remit to champion issues of inclusiveness whilst promoting the active engagement of communities of interest.
 - The 'York Environment Forum' (13th June 2006), remit to advise, discuss and comment on policies and strategic issues that effect the environment and monitor the implementation of the Community Strategy as it effects the environment.
 - The 'York Open Planning Forum', (12th July), community led forum which holds public meetings to discuss particular planning issues.
- 4.10 Each of these forums were presented with the issues and given the opportunity to debate the options and ask questions. The forums provided an opportunity to receive specific comments which were relevant to that particular group. The comments from these forums can also be found in the overall summary of comments set out in part 6 of this report.

Meetings:

- 4.11 Officers met with Network Rail on 7th July 2006. Originally a member of the Network Rail team was invited to the workshop on sustainable forms of transport, however several members of Network Rail were interested in attending the workshop. It was therefore decided that a separate meeting would be set up in which specific rail issues could be discussed.
- 4.12 Network Rail were keen to be informed of the Local Development Framework and the emerging Core Strategy document. They were also very keen to discuss some of the existing and emerging rail issues within York. These included rail improvements, the re-opening of existing lines and potential funding bids. The comments from this meeting have been incorporated into the overall summary of comments which can be found in part 6 of this report.

5. Consultation Response:

- 5.1 A total of 932 separate responses were received as a result of the consultation from 124 respondents. Respondents included a variety of groups, organisations and individuals.
- 5.2 To support the production of York's Local Development Framework (LDF) the Council have compiled a database to include the individuals and organisations that have registered an interest in the York LDF process. The responses from the initial Core Strategy Issues and Options consultation have been logged on the database and summarised. A summary of the key issues raised in the responses is set out in part 6 below.

6. Summary of Responses:

- 6.1 The following is a summary of the key issues raised by respondents as part of the initial Issues and Options consultation carried out in Summer 2006. The summary incorporates the comments received as part of the consultation via formal responses and also views gathered from the various workshops and forums. This summary is intended to provide an overview of the type and range of comments received under the key issues to aid the consideration of the second Issues and Options Document. A full breakdown of all the comments received has been recorded on the Council's Local Development Framework (LDF) database. A comprehensive review of comments received from both Issues and Options stages will follow once consultation on Issues and Options 2 is complete.

General Comments

Format of document

- 6.2 A number of respondents made general comments or comments which were consistent across a number of the topic areas. A number expressed concerns over a lack of clarity in the document, suggesting that attempts should be made to reduce jargon and use plain English; to explain terms such as 'sustainable' and 'spatial'; and to be clear about what we are referring to when we refer to 'the City'. It was also perceived by some that the term 'sustainable' had been overused in the Issues and Options. Others suggested altering the format of the document to make it clearer and improving the quality of the maps. There was disagreement between respondents as to whether the document included too much detail or too little. In the case of the former, some respondents felt that in many of the topic areas, it would be more appropriate to deal with some of the issues in the Development Control Policies DPD or in Supplementary Planning Documents rather than in the Core Strategy.

Policy context

- 6.3 Respondents raised a number of issues concerning the overall policy context of the document. Respondents stated that the document was unclear on the new planning process and sought greater clarity on the cross overs between

the different documents within the Local Development Framework (LDF) and with other Council documents such as the Community Strategy and Local Area Agreements. Respondents emphasised that the Core Strategy should be in conformity with the Regional Spatial Strategy (RSS) and that in many of the topic areas more reference should be made to RSS policies. Comments stated that the Issues and Options should be clear when referring to the draft and emerging RSS as well as recognising that the Core Strategy will need to reflect the most up to date position on RSS as it develops. Many respondents also raised comments regarding references to the Local Plan within the Issues and Options, stating that the Local Development Framework should not refer to the Local Plan. Across a number of topic areas respondents were also keen that examples of best practice from elsewhere were considered.

- 6.4 An overarching theme in many responses was that the Issues and Options document does not adequately consider the linkages and dependencies between different topic areas, the potential conflicts between different options and the need to balance various factors.
- 6.5 Other key issues raised were that the Core Strategy should be more positive about what it seeks to achieve and that it does not adequately address a number of issues, including green belt, security and crime, environmental capacity, rural issues and areas outside the main urban area, and open space, landscape and trees.

Section 1: Introduction

- 6.6 Respondents requested that timescales for the production of the Regional Spatial Strategy (RSS) were included in the document and that it included assurances that Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs) will be prepared at an early stage in the production of York's Local Development Framework.

Section 2: Spatial Portrait

- 6.7 A number of detailed comments were made regarding what else should be covered in this section, including key historical events; biodiversity issues; higher education results; the office market; and wider community and leisure uses. Comments were also made which requested more detail on particular issues such as the opportunity for rivers, floodplains and strays to be utilised for recreation and biodiversity; outlining of measures to protect from flooding; more discussion on the operation of transport interchanges and alternatives to the private car and the role of villages. Some respondents sought clarification on a few issues or disagreed with statements set out in the section, including disagreement with the significance of the Retail Study, arguing that York competes with other locations regarding the tourist offer not on the basis of retail; querying whether the 480ha of open space mentioned covers informal open space and open space belonging to Parish Councils or the Joseph Rowntree Foundation; asserting that the population of rural areas is higher

than 19% of the total population of the City of York; and that the list of listed buildings should be varied to include a wider range of types of properties.

Section 3: Sustainable Vision for York

- 6.8 Respondents were keen that the vision and objectives should reflect the unique character of York, although it was recognised that the vision must be based on the objectives of the Regional Spatial Strategy (RSS). A number of respondents made comments on the links to the Community Strategy. Some emphasised that the Local Development Framework (LDF) should deliver the Community Strategy and that the Council would need to provide clear justification for a vision and objectives which were completely different to the Community Strategy. However, conversely, other respondents suggested that the Community Strategy vision was not meaningful or adequate for the Core Strategy, and that it would need significant revision to be used as a basis for the LDF. In particular concerns were raised over using the Community Strategy's Sustainable City Objectives as these were felt to have little connection to spatial planning.

Spatial Planning Objectives

- 6.9 Concern was raised that more detailed spatial planning objectives would actually be required to guide development in York. Respondents stated that the spatial planning objectives should be more detailed and should set out which policy areas they refer to, and in some cases should be more ambitious and positively worded. A number of respondents suggested additions or detailed amendments to the spatial planning objectives to add clarity or to address perceived omissions. Suggestions included making reference to both the built and natural environment in objective 4 and sports and active recreation in objective 3, and referring to accessibility, natural resources and reducing crime. Overall, it was suggested that the objectives should be ordered to reflect priorities, that there should be an indication of the trade-offs and potential conflicts between different objectives and that an explanation should be included to outline how the objectives will be met and monitored. One respondent was concerned that care needed to be taken to ensure that an unduly inflexible regime was not created when all objectives and policies were read together.

Measuring Sustainability

- 6.10 Converse views were expressed regarding the Ecological Footprint Tool. Whilst some considered that a key goal of the LDF should be to reduce York's ecological footprint, others felt that the Tool was not a practical measurement tool on a city-wide basis. The need for an environmental capacity study was raised as a better alternative to Sustainability Appraisal for measuring environmental impact. One respondent considered that it was inappropriate to use the term 'most sustainable', suggesting the use of 'low impact' or 'less damaging' instead. It was also questioned whether sustainable economic growth could be achieved.

Section 4: A Sustainable Spatial Strategy for York

Approach to Spatial Strategy

- 6.11 A number of key issues were raised by respondents regarding the overall approach to the spatial strategy. Firstly, it was considered that the strategy should provide an indication of the scale of new development required and the amount of land which will be needed to meet the needs identified. Secondly, that the spatial strategy should set out how the strategic objectives translate into strategic policies which will influence the pattern of development. Thirdly, that the issues and options should set out alternative spatial options. Fourthly, that the spatial strategy should not use the Local Plan as a basis, but should outline the RSS approach, and finally, that the spatial strategy should consider potential conflicts between the housing and employment figures and the need to balance the different aspects of the spatial strategy.

Factors Influencing Location

- 6.12 Other issues raised regarding the spatial strategy concerned the need to prioritise the factors to be considered in determining appropriate locations for development. Other respondents considered that the correct factors for determining the spatial strategy had not been identified and that other factors over and above those identified should be considered such as highway capacity, access to a wider range of facilities, access to non-car transport modes, infrastructure quality and pollution, global environment change and limited natural resources. It was also considered crucial that location is informed by an environmental capacity study and that cross-boundary issues with other local authorities are considered. Respondents considered that all the factors identified should be applied to both urban and non-urban sites and that the employment criteria should be applied to all types of development. Some queried the types of development which were covered in the spatial strategy and argued that it should cover a wider range of development types including leisure, retail, sports and open space.

Locations For Growth

- 6.13 A number of alternative locations were put forward by respondents to accommodate future growth. Whilst some respondents reiterated the preference for development on brownfield land before greenfield land, citing the reuse of derelict or underused land and buildings. Others argued that there are either issues with focusing all development in the urban area or that there is not sufficient potential to meet the full range of development needs on brownfield land. Potential alternative locations were put forward including urban extensions, new free-standing settlements and some development in larger settlements outside the main urban area. There are also concerns that the restriction on development in the Green Belt is driving up land prices in the urban area. One respondent stated that although there was a need to protect green wedges and strays, the Core Strategy needs to consider whether in some cases urban green space is better than rural and should therefore be protected and development allowed in the Green Belt.

Employment

- 6.14 In terms of employment, some respondents disagreed with some of the market criteria identified for employment sites such as access to the university and considered that some other factors should be added such as considering the skills of the existing population and access to sustainable transport hubs.
- 6.15 Some respondents were concerned that the spatial strategy should not stagnate economic growth, whilst others viewed it as a good way of controlling economic growth.

Green Belt

- 6.16 Respondents considered that the Core Strategy should identify the Green Belt boundaries, some views were that this should involve undertaking a complete review of the Green Belt and various sites and areas were put forward to be considered as part of the review as either in or out of the Green Belt. Other respondents suggested that the existing draft boundary as defined in the Local Plan should be retained or that the Core Strategy was not the appropriate place to determine the detailed boundaries of the Green Belt. A number of respondents raised other issues related to Green Belt such as the importance of the Green Belt to villages, the need to refer to the Regional Spatial Strategy (RSS), and the six-mile boundary which is defined in the North Yorkshire County Structure Plan.

Historic Character and Setting

- 6.17 A number of respondents agreed that the preservation of historic character and setting should be a factor in determining location. Respondents emphasised the importance of preserving historic character and highlighted the need to consider detailed assessments of the impacts of development; to balance character against the need for the City to grow, to protect important views, and to distinguish between the different values of each of the historic character and setting categories.

Flooding

- 6.18 A number of respondents argued that no development or only minimal development should be allowed in floodplains. Comments outlined that the Local Development Framework (LDF) should be informed by further detailed analysis of flood risk and that the Core Strategy should consider drainage infrastructure and flood defence systems. It was advocated by respondents that the policy approach should consider encouraging flooding in open space/wash areas to alleviate flooding in residential areas.

General

- 6.19 A number of other general issues were raised in relation to the spatial strategy, including whether to achieve greater accessibility it is better to have centralised or decentralised services and also whether the LDF could encourage more innovative combinations of uses to make more efficient use of land, for example, having wind turbines in car parks.

Section 5: Sustainable Design and Construction

- 6.20 Overall respondents felt that the Local Development Framework (LDF) should be seeking a higher standard of design across the City. A number of respondents considered that this section should be strengthened in terms of requiring developers to incorporate certain sustainable design measures and to introduce targets and minimum standards. However, other respondents considered that the introduction of a blanket requirement is unreasonable and fails to take account of individual site circumstances and constraints outside the developer's control. In addition it was argued that rather than setting out city-wide principles, the Council should seek to encourage innovative and imaginative design on a site by site basis.
- 6.21 Comments received considered that the issues surrounding design and construction and its role in contributing to sustainable development should be expanded to refer to water efficiency, requiring renewable energy installations, allowing space for the separation and segregation of waste and encouraging the reuse of buildings rather than demolition. Although one respondent highlighted that the latter should take into account that the aim for zero emissions may discourage proposals for refurbishment. In contrast, other respondents considered that many of these issues would be covered by Part L of the Building Regulations.
- 6.22 In terms of general design respondents felt that the section should also include: landscape design; design to enable flexibility across the lifetime of a building; Sustainable Urban Drainage Systems; secured by design and a more detailed consideration of designing out crime; urban and rural design; and making use of local skills. Respondents wanted the Core Strategy to emphasise that 'Ease of movement' should include consideration of those with disabilities, but it should also take account of potential higher priorities such as protecting character.

Historic Environment

- 6.23 Respondents felt that the Core Strategy should state that the Council have a duty to preserve and enhance historic areas. It was agreed that the Core Strategy should strengthen the approach to Village Design Statements, Town and Parish Plans and the Local List. Respondents considered that the section should mention Conservation Areas and outline the Council's intention to produce Conservation Area Appraisals and management plans and more guidance in the form of Supplementary Planning Documents. One respondent was concerned that the use of historic buildings should also be considered, as some uses are damaging the fabric of historic buildings. Diverse views were expressed regarding the height of buildings with some feeling that there should be no tall buildings, whilst others felt that they should be permitted, particularly on York Central. Overall, it was felt that the section should consider the design issues for the historic centre and outer areas separately.

Key Issues and Options

- 6.24 Some respondents put forward different priorities for the key factors identified, although a number considered that all the factors were important. Although

some respondents agreed that we should use CABE (Commission for Architecture and the Built Environment) principles, others were more critical of the CABE approach, arguing that the Local Plan approach was better than CABE, or that CABE failed to take account of community and quality of life which they considered to be a key objective of the LDF.

Section 6: Housing

Housing Figures

- 6.25 A number of respondents considered that there needed to be greater clarity regarding the housing figures emerging through the Regional Spatial Strategy (RSS). Further explanation was requested on the difference between the Local Plan figures and draft and emerging RSS figures. Respondents considered that the Core Strategy should reflect the most up-to-date RSS figures and an updated study of local housing need and should not assume that the current housing figures will be maintained in RSS.
- 6.26 Respondents also raised concerns about the fact that no overall housing figures were included and that this meant it was difficult to assess what impact the figures would have on issues such as market demand, commuting and the special character of the city. In addition respondents were unclear as to whether the approaches identified would provide sufficient land to meet the RSS requirements. One respondent was also critical of the way the past completion rates were presented, arguing that the annual completions hid significant fluctuations.

Local Need

- 6.27 Whilst some respondents considered that priority should be given to existing York residents, others disagreed with an emphasis on local people. It was considered important that the Local Development Framework (LDF) recognises the patterns of commuting for employment in its housing provision and that therefore some demand for housing comes from people who commute out of York for work and that there is no guarantee that new housing will be filled by people who will work in York.
- 6.28 On a related issue, respondents expressed concerns regarding the number of properties that were being purchased for investment rather than inhabitation and the problems associated with empty dwellings and second homes.

Location

- 6.29 A key issue in determining location was considered to be the need to locate housing in areas with good transport links and access to employment, services and facilities. In effect, an important consideration should be determining how people will live and locating housing and other uses accordingly. A number of respondents wanted assurances that the appropriate infrastructure and facilities would be provided to support new development. Respondents were divided over whether it would be appropriate to mix housing with employment or other uses. Other considerations suggested by respondents included flooding and making use of York's assets such as the river, the availability of land and also the need to build at an appropriate scale and in appropriate locations to support balanced

development, for example at a scale which enables the incorporation of communal heating and cooling.

- 6.30 In terms of greenfield/brownfield development, whilst some argued that no housing development should take place on greenfield land, others were concerned that there was insufficient brownfield land to support future housing need and therefore there may be a need to identify greenfield sites for housing. As well as concerns about insufficient brownfield land, respondents also highlighted that maximising brownfield capacity could be detrimental to the historic core of York and that in some cases greenfield sites may be more sustainable than brownfield locations. In this case, sites should be identified using sequential approach to direct development to most sustainable greenfield locations. Although one respondent advised that sequential approach should be omitted because it is not included in PPS3.
- 6.31 Other options identified were urban extensions or edge of urban area locations and consideration of the role of settlements outside the urban area in providing for new housing, based on a settlement hierarchy defined through the Core Strategy.
- 6.32 There was some support for developing existing large garden plots for additional housing although others raised concerns that the current policy had led to piecemeal development which mitigated against the development of sustainable communities and therefore there should be a presumption against garden development. There was some concern that the under occupation of large dwellings is encouraging the subdivision of units and plots.
- 6.33 Some respondents wanted specific reference to be made to the phasing of sites to avoid over-saturation of the market and to ensure that preference is given to developing the most sustainable sites.
- 6.34 A number of respondents wanted to see specific recognition of York Central and Castle Piccadilly as sustainable locations for new housing.

Density

- 6.35 A number of key issues emerged from respondents comments on density. Whilst some considered that we should not build at higher densities others accepted that it would be necessary but highlighted a number of impacts which should be taken into account when seeking to develop at higher densities, namely: the impact on residential amenity and privacy; the impact on character, particularly on the rural character of local villages; and that certain standards such as Lifetime Homes should not be compromised by the necessity to develop at higher densities. Respondents felt that the Core Strategy should ensure a high standard of building and consider best practice examples from elsewhere in Europe on high density living. Respondents were concerned that the need to develop at higher densities needed to be balanced against the need for more family housing and it was considered that due to higher density development in the city centre it may be necessary for family housing to be accommodated in a new settlement or satellite development.

Priority Groups for Housing Provision

- 6.36 A number of respondents considered that greater priority should be given to housing for older persons and those with special needs, with a focus on providing a wide mix of types ranging from residential care homes both private and public to sheltered or wardened accommodation (both flats and houses) and lifetime homes. Respondents considered that it was important that housing for older persons was located close to community facilities. Some suggested that they could be developed as part of a wider range of mixed and compatible uses and Hartrigg Oaks was given as a good example.
- 6.37 As well as provision for older persons it was also considered important to provide housing for families (rather than flats), younger people (perhaps with a youth warden), those who require wheelchair access or have visual or auditory handicaps, first time buyers, single people and young professionals to match the growth in Science City York and high tech employment, key workers, and the needs of people who will work from home.

Mix

- 6.38 A number of respondents highlighted that the Core Strategy should seek to provide a more balanced mix of new housing to meet local needs and market demands. A primary concern was that there should be no more flatted development. There was some disagreement as to whether we should provide for a wide range and mix in all developments or whether a more flexible approach should be adopted to allow an appropriate mix to be determined on site by site basis.

Affordable Housing

- 6.39 There was wide recognition of the level of affordable housing need in York. However, a number of different viewpoints were expressed in terms of the level of affordable housing that should be sought in new developments. Some considered that the level should match the percentage advocated in the Regional Spatial Strategy (40%), whilst one respondent suggested that nothing above 25% was achievable. Similar views were expressed regarding the council's current 50% target, claiming that it undermines the viability of many schemes and concerns were that the Council had not adequately demonstrated local need to justify the 50% figure as required by RSS. In contrast, others felt that a higher percentage of affordable housing should be sought. Other respondents suggested alternative policy approaches such as strengthening policy by specifying a number of bedrooms or a certain floor area or that applications with the highest level of affordable housing should be prioritised for consent in order to reach annual targets. A number of respondents felt that the policy approach needed to be more flexible in order to facilitate development on certain sites and have regard to economic viability, for example on the development of complex mixed-use brownfield sites. Others felt that the proportion of affordable housing on a site should be related to demonstrable need in that specific area. It was argued that working in partnerships between stakeholders would allow for greater flexibility and wider options.

- 6.40 In terms of the type of affordable housing to be provided, respondents emphasised the need for a range of affordable types and tenures although a few were specifically mentioned, namely, affordable housing ‘to buy’ rather than ‘to rent’, shared equity schemes, targeted at specific groups such as older persons (to release family housing back onto the market) and to meet specific needs in rural villages. A number of respondents were keen to point out that increased building on Green Belt would not provide a solution by reducing house prices and that reliance on building flatted developments would not provide affordable housing.

Students

- 6.41 The perception expressed was that there is a concentration of student houses in certain parts of the city, that students disrupt communities and that there is a conflict of lifestyles between students and existing residents. However, one respondent stated that research carried out by York University showed that the perception that there is a large concentration of student properties in certain areas is incorrect. A variety of solutions were put forward by respondents. Some felt that it should be the responsibility of the universities to provide affordable accommodation for a greater percentage of their students and where possible provide on-campus, whilst others considered that in order to provide for better integration and a better mix, student housing should be distributed throughout the city. Also this would address the concern that restricting student housing in some areas would increase pressure elsewhere. One respondent was concerned that financial contributions required from developers will inhibit the provision of student housing.

Gypsies and Travellers

- 6.42 A primary concern expressed by respondents was that the provision for gypsies and travellers should be based on robust evidence to properly establish need and that this should be based on a proper understanding of the needs of these cultural groups. It was considered appropriate to draw on and carry out assessments at a regional or sub-regional level. A number of other factors were identified, including the need for permanent rather than transient sites, and that sites should be identified away from the settled community. Respondents argued that York’s Local Development Framework (LDF) should plan for the provision of enough decent gypsy and traveller sites for York and that the Core Strategy should set out the criteria for the location of gypsy and traveller sites.

Section 7: Economy and Employment

Policy Context

- 6.43 Respondents highlighted that the section needs to reflect the current Regional Spatial Strategy (RSS). One respondent emphasised that the Core Strategy needs to be based on the Economic Strategy and set out how it will be delivered.

Employment Figures

- 6.44 A number of respondents commented on the job numbers put forward in the Issues and Options. Some felt that the evidence for the employment figures

was flawed, that the methodology was unclear or that the figures should be reconsidered to reflect RSS and Core Strategy Objectives rather than the Local Plan. Whilst some considered that there should be greater flexibility to achieve a higher level of growth than 19,000, others considered the 19,000 figure to be too high and unrealistic. The growth rate proposed was considered to be disproportionate in comparison to national levels and unnecessary due to full employment in York.

- 6.45 Respondents were concerned that the employment figures did not take account of sustainability issues or the capacity of the city to accommodate the level of growth. There was also concern that the figures failed to take account of the decline of traditional manufacturing and that the Core Strategy did not consider growth across an appropriate timescale. A number of respondents expressed concerns about the potential impacts of employment growth, in particular on the need to protect green belt, the impact on commuting levels, congestion and the transport network, and the need to safeguard York's character and heritage. Respondents highlighted the need for environmental capacity study and for job growth to be matched by sufficient housing provision. In contrast it was considered that the low growth option would reduce problems of infrastructure and congestion.
- 6.46 One respondent did not think that York should be included within the Leeds City Region. However, a number of respondents saw benefits to the York sub-region and considered that the issues surrounding employment growth should be considered across the York sub-region. It was considered more appropriate that the 19,000 jobs were achieved within the sub-region rather than just in York, with sustainable links to areas such as Malton and Selby.

Amount of Land

- 6.47 Respondents sought clarification on how the employment figures have been translated into a demand for employment land. It was considered important that the Local Development Framework (LDF) is informed by a full review of the amount and type of employment land required, including a review of existing sites. Whilst it was suggested that the priority should be the identification, allocation and delivery of necessary employment sites to meet employment objectives, others considered that it would be appropriate to allocate an excess of employment land in a range of sustainable locations in order to either ensure an ample supply of appropriate sites to meet future demand or to accommodate higher levels of growth. Many considered that it was crucial that a range of good quality sites was maintained and protected with a priority on sites which meet the needs of the market.

Location

- 6.48 A number of factors were put forward by respondents as being important for determining appropriate locations for employment sites. It was considered important to focus on sites which were the most accessible to the majority of York's population. Therefore employment locations should reduce the need to travel and reduce dependence on the car by choosing locations with accessible public transport. It was felt this could be achieved by developing on previously developed sites within the urban area which would have minimal

impact on the highway network. One respondent highlighted that although the city centre is constrained due to historical nature, it is a small city and therefore you can develop in surrounding urban areas without being too far from centre or needing to develop in the Green Belt.

- 6.49 In contrast, other respondents considered that there was a lack of available land in the city centre and that it may be more appropriate to develop satellite employment parks on the periphery of the urban area or consider sites within the Green Belt as these may be more sustainable. Further respondents agreed that there was a need to develop high quality, headquarters type development in the Green Belt. Although some questioned the sustainability merits of these 'quality sites'.
- 6.50 Overall the majority of respondents on this issue advocated a comprehensive approach taking into account a wide range of factors such as meeting market requirements, placing emphasis on quality, SQW criteria, flood risk, the sequential test and sustainability. Location should take account of the character, size and appropriateness of the activity or use proposed and that quality of life should be considered important at all locations, for example the attractiveness of site (possibly, making more use of the waterfront), proximity to social facilities, shops and restaurants.

Types of Employment

- 6.51 A number of respondents sought a wider range of types of employment to be recognised through the LDF, such as increased numbers of people working from home and small businesses, business start-ups and self employment. In particular it was suggested that small scale flexible units should be provided for these purposes. There was not considered to be enough focus on high income employment, such as Science City York type uses and high level manufacturing and engineering such as bio-science and high-tech IT. Other respondents felt that there should be more recognition of the fact that York is still a low wage economy and that there is little demand for B2 type uses now in York. Although others considered that the Council should develop a strategy to avoid future industry closures. A number commented that the Council should exclude any attempts to relocate public sector and government departments to York.

Premier/Standard Employment

- 6.52 A number of respondents raised concerns regarding the premier and standard employment land classifications. Respondents commented that categorising sites as premier and standard has proven to be unsatisfactory and ineffective and should be reconsidered, in particular the definition of uses considered acceptable on premier sites is considered to be unduly restrictive. For example, one respondent said that there was a need for high quality office space, which would not be classed as premier uses but have the same site requirements as premier type uses. In addition it was suggested that it was unclear why some sites had been allocated for premier employment and that some of these sites appeared unlikely to attract premier type uses.

Education and Training/Local People

- 6.53 A variety of issues were raised in connection with education and training and employment growth. Respondents identified a need for investment in education and training so that local people can fill the new jobs. They felt that developers should be encouraged to use local labour skills in the construction of new buildings and that the education sector, particularly the universities needed to recognise the links to economic growth and find ways of supporting that growth, particularly with regard to Science City York. Overall, it was considered that the Core Strategy needs to review the types of jobs York wishes to encourage, it should emphasise more entrepreneurship and start-up businesses and recognise that some new technical and service sector jobs will not adequately replace jobs lost in the manufacturing sector.

Change of Use of Employment Land to Other Uses

- 6.54 A number of respondents expressed concerns about reallocating employment land for housing, some considered that it should not happen at all whilst others considered that this approach should be adopted very cautiously and strictly controlled to ensure a balance and range of employment sites is maintained. It was also highlighted that it should only occur in certain circumstances for example, where a site is no longer required for employment use, or it involves the relocation of a current inappropriate use. Sites should also be appropriate for housing and be close to public transport, shops and services. Some commented that surplus employment sites should be considered for a range of different uses such as open space and mixed use, rather than just housing.
- 6.55 Other respondents expressed support for a more flexible approach to the reallocation of employment sites in order to reflect market trends and priorities and for changing circumstances to be reflected across the plan period.

Retail and Leisure

- 6.56 Some respondents thought that the economy and employment section should recognise the role of retail and leisure as a future employer, particularly for lower wage earners and therefore identify retail and leisure as employment functions and incorporate them into the overall employment allowances.

Rural

- 6.57 A number of respondents felt that the economy and employment section did not provide sufficient consideration of the rural economy and employment, the role of villages and local services.

Site Specific

- 6.58 A number of respondents made comments about specific employment sites. Some thought that Terry's, Castle Piccadilly and British Sugar should be mentioned as sites with employment opportunities. Others wished to see York Central prioritised and promoted as a mixed use site or central business district, although the Core Strategy should be realistic about timescales and what the site can accommodate as well as the need for satisfactory infrastructure. Monks Cross was also referred to as a site with opportunities for a sustainable, mixed use development, although there were concerns that this had not been achieved due to lack of transport provision.

Section 8: Retail

General Comments

- 6.59 Respondents suggested that this section should be more comprehensive and should explain why retail is not considered to contribute in employment terms. Retail growth within the document should relate to York as a whole rather than the City Centre alone, with an emphasis placed primarily on the need for development. It was noted that there is little priority given to professional services i.e. managerial and financial services both within City Centre and outside. In addition to this, the historic environment should be an overriding factor and Castle Piccadilly should be emphasised as a top priority for retail development. It was also suggested that the Roger Tym Retail Study is significantly flawed.

Options

- 6.60 In general, there was support for opting for a rising market share or a falling market share, but there was little support for a strategic market share. It was suggested that all of the options should take more account of the historic character of York. In the executive summary there was more support for giving priority to the City Centre with possible extensions rather than identifying areas outside the City Centre for retail growth. Respondents suggested that expanding the defined town centre should be considered in order to increase the amount of retail permitted. Respondents were keen for little or no further development of out of centre retail developments but agreed that if development is essential then it is preferred outside of, rather than in the City Centre.

Transport Implications

- 6.61 Some respondents placed emphasis upon the development and improvement of transport including providing for the private car. It was said that the reduction in car parking charges would encourage people to shop in the City Centre rather than at out of centre locations.

Types of Retail

- 6.62 The diversity of shops should be promoted although it was recognised that the introduction of larger chain stores such as Zara and H&M will have a positive impact on the City too. It was suggested that Monks Cross is the City Centres main competitor whilst the Macarthur Glen designer outlet encourages people to visit the City Centre as people make combined trips. There was a lot of encouragement for the development of a permanent indoor farmers market as the current market facilities are in need of modernisation, and it was suggested that there was more support for more specialist shops and discouragement of development of larger more main stream shopping. Respondents also considered that internet shopping should be mentioned in the retail section.
- 6.63 Views generally reflected that development should be sympathetic to local needs and respondents were keen for York not to become a 'gift shop'. Respondents felt that more local shops should be encouraged rather than

larger chain stores and that the Core Strategy should be informed by an up to date study of local facilities.

Policy Comments/ Implications

- 6.64 Respondents recommended that the retail section should be consistent with PPS6 and that retail allocations should be informed by the strategic flood risk assessment and the sequential test. Respondents felt that a key issue was to determine how much it is acceptable for the character of the City to be affected both in terms of the physical impact of new retail construction, and the impact of any new retail development on vitality and the existing historic street. It was also suggested that any future retail expansion of the City Centre should be circular rather than linear.

Section 9: Culture and Tourism

General Comments

- 6.65 Respondents pointed out that there was no acknowledgement of the effects on other businesses of the 4 million visitors who come to the City, and that the section makes no reference to business tourism. Respondents identified a need for a major new space either within the City Centre or at an edge of centre location which could cater for major events and festivals. Overall it was thought that more events and festivals were needed in the City. A number of respondents suggested that the area between Clifford's Tower and the Foss, and the Castle Museum and Tower Street would provide a good setting for concerts and events of national importance. Respondents argued that a luxury hotel was not needed in the City although they felt that consideration should be given to building a range of 3* and upwards hotels. Respondents considered that there was a need to carry out a major review of information signs and maps, highlighting a particular need for more 'you are here' type boards and for the review to recognise that the streets are currently cluttered and inaccessible to those who suffer with a physical or mental disability.

River/Waterways Comments

- 6.66 Views suggested that the rivers Foss and Ouse should be utilised as tourist attractions and also for commercial transport. It was also suggested that the Foss basin should be considered as a suitable site for tourist and residential moorings.

Public Space/Art

- 6.67 Respondents requested that a better definition of the cultural quarter was provided in the Core Strategy. Respondents considered that in determining whether public art contributions are appropriate, account should be taken of the scale and location of the development, its viability, and any other public realm provision or contributions that should be made.

Evening Economy

- 6.68 It was recommended that consideration of the evening economy should relate to more than simply commercial considerations e.g. social, cultural and

educational considerations and that there should be specific mention of the need to protect and promote theatres. Overall, respondents suggested that the Council should invest in ways of improving and enriching what is currently available within the City rather than increasing the current offer.

Site Specific Comments

- 6.69 Many consultees expressed disappointment that York no longer has a central tourist information bureau, and requested that one was provided. In particular respondents highlighted that York Central provided an opportunity to provide facilities such as exhibition and conference centres, leisure facilities and hotels.

Transport/Accessibility Issues

- 6.70 A strong view suggested was that parking in the City Centre in the evening needed to be reviewed. Respondents also raised issues concerning crowded streets and traffic problems and felt that these should be addressed through carefully planning the location of new attractions. It was also considered that accessibility to existing attractions should be increased by introducing more sustainable modes of transport but that the Core Strategy should recognise that some visitors will always choose to arrive by car.

Section 10: Community facilities

General Comments

- 6.71 Respondents were concerned that, with regard to community facilities, the needs of older people had not been addressed and that there was minimal reference to, and provision for, younger people. Respondents recognised that communities require space to socialise and communicate, and felt that York is currently struggling to provide this. In addition, it was considered that the Core Strategy should recognise the role and function of modern libraries, refer to the role of charitable organisations and be informed by demographic trends.

Leisure Facilities

- 6.72 Respondents were critical of the current swimming provision within the City, and also of the decision to close the Barbican Centre. It was suggested that a leisure survey should be conducted throughout the City to decide a course of action on swimming pool provision.

Education Facilities

- 6.73 Respondents welcomed the dual use of school facilities, and considered that this should be secured through community use agreements. It was also suggested that York University needs to be better integrated into the City, and that the Core Strategy should refer to York St John University.

Health Facilities

- 6.74 Respondents requested that Doctor's surgeries and other essential local services were accessible from new developments especially for elderly people. It was considered that these services should be accessible through modes of transport other than the private car. However, it was recognised by one respondent that the provision of healthcare was dependent on the new

Primary Care Trust (PCT) arrangements. Some respondents expressed a keen interest in raising the profile of the prevention of health care problems through the promotion of healthier lifestyles with more opportunities for active recreation and participation in sport.

Sport Facilities

- 6.75 It was suggested that York Central is an ideal location for sports facilities, with high priority being given to the relocation of York football club to the site.

Open Space

- 6.76 Some respondents suggested that it is unclear as to what open space actually means, and suggested that the definition adopted in the LDF should not be too narrow. Respondents considered that there was a shortage of open space within York, and therefore the Council should designate new areas of open space and that it should not be reduced as this impacts on flooding and pollution. Other respondents suggested that new housing developments should be encouraged to provide for more than just new residents and should contribute to the quantity and quality of open space within the particular community in which they are building. Respondents said that it was unclear as to what effects new housing and employment will have upon demand for existing and future facilities. In addition, PPG17 is only mentioned in the context of open space and it was understood that the guidance covered more than simply open space.

Policy Issues

- 6.77 It was thought that the location of any new social, educational, health and emergency facilities needs careful consideration in terms of flood risk. Respondents recommended that a green corridor strategy be carried out to look at the current value and opportunities for green corridors in York. These could then be made into green transport links for pedestrians and cyclists.

Section 11: Historic Environment

General Comments

- 6.78 Overall, in terms of the historic environment respondents recommended that protection and preservation should be the foremost priority. Primary concerns were that it should be recognised that packing development into small historic buildings will damage their fabric; that the target number of jobs (outlined in chapter 7) should take account of impact on historic environment; and that the LDF should ensure that new developments do not interfere with the setting of historic buildings which may disassociate them from the surrounding environment.

Historic Views

- 6.79 Some respondents requested that the issues within the Core Strategy be modified to acknowledge that respect for important views does not mean that every existing view should be retained, and respecting the scale does not mean that taller buildings are prohibited. The Core Strategy should also ensure that new developments in appropriate out of centre locations can play a role in reducing the visual impact upon more historic areas. Respondents

considered that it was essential that the views of over ground archaeology and ancient monuments are preserved, and that new buildings keep within the context of 'old York' using sympathetic materials.

Policy Comments

- 6.80 Respondents emphasised that the Council have a duty to develop policies that will preserve and enhance the character and appearance of conservation areas. Some argued that the Core Strategy is not the place to market CABI principles, and that these should be in an Supplementary Planning Document (SPD). It was recommended that the Council adopt guidance set out in PPG16 for archaeology, and PPG15 planning for the historic environment. Respondents stated that all development should be informed by a conservation area appraisal or a design statement, leading to an agreed conservation management plan, which can then be used to produce SPDs. However, consultees recognised that the LDF gives an opportunity to reassess certain current approaches, for example, to reconsider the approach towards the preservation of archaeological remains.

Section 12: Natural Environment

General Comments

- 6.81 Requests were made by some respondents for an increase in tree cover, although it was emphasised that these should be placed where they do not harm buildings. Respondents considered that the section should establish what we mean by native trees and accept that these may change due to climate change. New areas of biodiversity need to be created and we should plant more hedgerows and woodland and increase tree cover (not just through new development). Consideration should also be given to planting a new community woodland within the York area. One respondent suggested that this section could usefully include gardens and other adhoc village and city open spaces like ponds and village becks, and greater emphasis needs to be placed on the Green Belt.
- 6.82 Respondents emphasised that the LDF should seek to protect species that are of regional, national and international importance, although some comments reflected acceptance of some species being lost due to global warming.

Rivers

- 6.83 Respondents felt that priority should be given to monitoring rivers, and reference should also be made to some of the more minor watercourses. Presumptions by one respondent were made against culverting, piping and diversion of watercourses although there is no mention of this within the Core Strategy. There should be a balance between exploiting rivers for tourism, recreation and sport and protection of natural habitat, whilst establishing some form of management of the river corridors.

Brown field Land

- 6.84 Views agreed that development on brownfield land needs to be sustainable and should improve and enhance the existing natural environment. New

development should also seek to restore and enhance the biodiversity of sites.

Designated Areas

- 6.85 It was argued that there should not be any additional designations without strong justification, and that better access should be provided for designated recreation, open space, and countryside assets in the area. However it was argued that access is not a good criterion to determine priority. It was also noted that Foss Island Nature reserve is under-used.

Policy Comments

- 6.86 PPS 7 is clear that local authorities should not designate local areas of special landscape value. There were suggestions that an SPG on landscape design codes is needed.
- 6.87 It was also emphasised that there is a need to carry out a Biodiversity Action Plan and produce an SPG urgently before any major decisions are made. It was agreed that all new policies should be based on the principles set out in PPS 9. It was recognised that policies should protect all species not specific ones and species should not be prioritised.
- 6.88 Respondents suggested that we should have a list of green sites like we have listed buildings, and one respondent suggested adopting a regional forestry strategy.
- 6.89 Some respondents did not wholly agree with the policy approach. Also emphasis should be placed upon the use of Natural England's policies and DEFRA's stewardship prescription codes for the countryside.

Section 13: Transport

General Comments

- 6.90 There were various solutions put forward to improving transport and congestion within York. It was suggested that people need to be more informed of their public transport options. Another suggestion was that we should be making better use of the ring road by encouraging new development near to the ring road. It was requested by several respondents that congestion charges should only be introduced once traffic and/or pollution levels reach a certain threshold and that the Council's intentions on congestion charges should be clearly stated within the Core Strategy.
- 6.91 It was also noted that there is no mention of road safety within the Core Strategy, however it was suggested that by introducing a 20 mph speed limit on all inner City roads this would increase the safety of the City. It was also thought that only essential vehicles should be allowed within the City Centre. York is not exploiting the size of the City i.e. 15 minutes to cross the City by cycling.
- 6.92 Respondents also requested that more environmentally friendly and sustainable forms of public transport be available within the City, for example

the use of electric buses. We should make better use of the river Ouse as a transport route. It was suggested that consideration should be given to introducing a waterbus service. Cross City transport links are needed, and not just into the City Centre.

Bus

- 6.93 Many respondents suggested that we need a bus station close to the train station, and that buses running later into the evening are needed. It was strongly suggested that the bus information Centre at George Hudson St be re-opened or re-located. It was mentioned that the FTR Future Bus and bendy bus have added to congestion as they struggle to move around the City Centre. It was noted that a child's ticket price is $\frac{3}{4}$ of that of an adults and this should be reduced. It was suggested that people should be given a 1 year free bus pass as an incentive to use public transport.
- 6.94 Improvements to Grimston Bar P&R should be considered by the Council. The statement within the document that bus use has increased by 49% is misleading and actually should state that that most of this increase is due to the rise in P&R (Park and Ride) use. Park and ride schemes need strengthening with the focus on the development of the A59 site.

Train

- 6.95 It was recognised by many respondents that the proposed station at Strensall and Haxby is long overdue. National rail confirmed that the Haxby/Strensall station is in the process of trying to get an exceptional schemes bid, and it was confirmed that the Copmanthorpe line doesn't meet health and safety standards and is not viable for development. Likewise the Poppleton station is not feasible in operational terms. There was a lot of support to bring all or some of the redundant railway lines back into use, although the cost of this is underestimated by some and could only come from government funding. National Rail confirmed that it is not possible to have a stop at the British Sugar site as it is on the mainline.
- 6.96 There are also considerations of having a tram train in the Harrogate line with possible stops at Poppleton Business Park and York Central although some consultees argued that the tram would be difficult to implement in York. Research is also being done into light rail i.e. Sunderland Nexus Scheme. In terms of freight, it was recognised that there is no room to expand the network, however the river should be considered as a freight option.

Cycling/Pedestrian Provision

- 6.97 It was suggested by many respondents that the needs of Cyclists and pedestrians should be given priority at the application stage of the planning process. It was agreed that essential services should be within walking distance. i.e. doctors surgeries. Some recommended investing in Danish / Dutch style cycle paths and we should expand pedestrian zones / cycle lanes within the City Centre and introduce more facilities i.e. parking shelters. Cycling should be given the same priority as the car and safety should become a priority.

Car

- 6.98 Many views suggested that cheaper evening car parking was needed to encourage a lively City Centre, however others suggested that there should be an increase to the cost of parking overall with a reduction of the number of car parking spaces within the City. Some thought that we should differentiate between visitors, residents and business users in terms of car parking. More taxi ranks are requested, and it was noted that there is no mention of car clubs within York (including moped clubs and car sharing lanes).
- 6.99 It was recommended that the parking capacity on the A1079 needs to be increased and one respondent pointed out that there is no parking strategy outside of the City Centre. It was noted that by reducing the number of parking spaces to reduce the overall car usage within the City, this was contrary to PPG13. Respondents felt that the Core Strategy should also encourage new developments not to have car parking like that at Hungate, whilst looking at patterns of car use i.e. trips to the supermarket.

Policy Comments

- 6.100 It was pointed out that the timescale of this plan should be increased to incorporate a longer vision for transport i.e. 20 – 30 yr plan. Document needs to consider the financial consequences of a large scale modal shift to public transport, need to include fully costed proposals to support the objective of increasing public transport capacity in the city without corresponding investment outside of the city. One person suggested that flexitime within the workplace should be encouraged to spread peak traffic times at work to spread out rush hour.
- 6.101 The document should ultimately reflect the Regional Transport Strategy, and reference should be made to empirical studies. The Core Strategy should also mention how the transport system will be monitored. It was documented that there was no policy to promote bus use within the City. Some thought that York's eco-footprint should be tackled, and that this should be done through educating people about climate change and its effects. It was reported that this section is brief and more information is needed.

Section 14: Waste and Minerals

General Comments

- 6.102 Suggestions were put forward that the costs / benefits analysis should be calculated in terms of increasing the number of collections and possibly introducing a waste collection charge. Many respondents suggested a need to charge manufacturers and retailers for over packaging products, and we should promote a change in attitude towards packaging. This could be done by looking to Europe for best practice.
- 6.103 Some respondents suggested that burning of waste needs to be carefully controlled and that there is a possibility of recovering energy from this process. However some were against incineration altogether and thought that other new technologies should be explored. It was requested that more information was needed on what is biodegradable, and consideration should

also be given to disposing of waste locally i.e. York should dispose of York's waste. One respondent picked up that there was no mention within the document of wasted water.

Recycling

- 6.104 One person suggested providing small businesses with recycling facilities similar to those provided for households by the Council. Recycling should be made simpler in terms of separating items. Some suggested more communal bins to promote recycling, including improving facilities within the City Centre for tourists.

Minerals

- 6.105 In terms of minerals, one person thought that the issue should be dealt with only if there is a national shortfall, whilst others thought that mineral extraction was not an issue for York.

Policy Comments

- 6.106 Comments received suggest that this section was short on substance and that a long-term re-instatement plan was needed. The Council should ensure that an EIA (Environmental Impact Assessment) has been done before any new sites are considered for development. The Council adopting a zero waste charter was another suggestion. Generally views on this chapter suggested that the regional waste strategy / gravel study should be related to. The allocation of minerals and waste sites should be informed by a SFRA (Strategic Flood Risk Assessment).
- 6.107 Some respondents thought that construction waste should be included in this section. Only building new waste facilities on brownfield land was another view which was supported. It was thought that the waste hierarchy diagram within the document does not correlate with the national targets elsewhere in the Core Strategy. York should seek to emulate Ryedale in terms of recycling.

Section 15: Environmental Protection

General Comments

- 6.108 It was considered essential by some respondents to identify where pollution problem could potentially develop and controls should be put on future developments to minimise the impact of this pollution. Development should also be limited where there are existing problems, with specific problem areas being targeted. Traffic must then be controlled to reduce air pollution specifically. Some suggested implementing a City wide air quality zoning system, and it was thought that data should be made more accessible to influence people's travel choices. Someone suggested that employment development should occur near existing P&R sites to reduce noise and air pollution, whilst another suggested developing near to the train station should be progressed with care. However by zoning the City it was thought that this could possibly restrict tourist development in the future.
- 6.109 In terms of drainage and flooding, it was thought that this problem is getting worse, however there is no mention of flooding within this chapter and this

contradicts the pictures within the document. In line with this, people agreed that the cleanliness and quality of the Foss and Ouse are to be carefully monitored. One person suggested that we should mention pollution caused by the pleasure craft on the rivers. In terms of car use, it was suggested by a few respondents to introduce car sharing or to create a City where non essential vehicles are banned from the Centre.

Policy Comments

- 6.110 Respondents showed support for targeting specific areas with existing pollution problems and identify areas that may not yet pose pollution problems, rather than implementing a zoning system on a City wide basis. They did however suggested that the section was short on substance and needed more detail. People recognised that there is a need for an overall traffic plan. One person suggested that policy regarding noise pollution should not discuss the manufacturing element as it's in decline. Suggestions were made to include a core policy on floodrisk which mentions surface and ground water. It was noted that no reference has been made to PPS23 or to primarily using brownfield land for development. It was also suggested that this chapter should be combined with the construction chapter.

Section 16: Renewable Energy

General Comments

- 6.111 The main priority suggested by respondents was to reduce consumption. It was suggested that information within this chapter is misleading and ambitious. This chapter should focus on what York can do best, and one person was critical of York's current approach suggesting people needed better understanding of the available and realistic options. There should be an increase in the number of government grants available, and access to these grants should be made easier. Some talked about encouraging community based energy schemes which should be encouraged by working with other local bodies.

Historic Environment

- 6.112 In terms of the historic environment, respondents recognised that it will sometimes be inappropriate to install renewable energy equipment due to the sensitivity of the historic nature of York. We need to balance the need for development and the historic environment, and any development or change should compliment the conservation areas. It was suggested that the Council should be encouraging development to include innovative features, and encourage the re-use of historic buildings. Some respondents requested that there was a need to explore more in terms of how renewables can be incorporated into the historic environment, whilst considering the cost / benefit analysis of renewables.

Types of Renewable Energy

- 6.113 In terms of the different types of renewable energy, these should be outlined within the document. Someone suggested that the river Ouse could be capable of some form hydroelectrical supply, and that Solar panels should be more generally permitted even if the building is listed. It was noted that Photo

Voltaic will only become viable once the price reduces, likewise with ground source heat pumps. Reference within the document should include solar thermal and not just PV. Some suggested that York should not have any wind turbines, whilst others suggested that small rooftop turbines would be appropriate within York. Some respondents suggested that we should adopt biomass heating in schools using locally grown grains, however they realised that this may change the local landscape character of the land. Some recommended that within this chapter we should be encouraging 10% on-site renewables and placing stronger demands upon developers to provide development which incorporate renewable initiatives. An example of a potential major renewable energy site within York was suggested as the British Sugar site which could produce bioethanol.

Policy Comments

- 6.114 Respondents suggested that planning permission should be conditional on the adoption of a energy savings plan. All of the information set out within the Core Strategy should conform with the RSS and PPS22. The Core Strategy should be promoting renewables rather than restrict them and policies should encourage and set out criteria to ensure a robust assessment. One respondent suggested calling the chapter 'Sustainable Energy Use'. It was felt that in places, the Core Strategy contradicted itself, for example when we are saying more jobs and homes yet we need to reduce consumption to become sustainable. An energy saving and consumption policy should be developed. It was also suggested that the Council should consider what a development costs in terms of energy before it is granted planning permission and that local authorities should lead by example – e.g. by the Council removing flood lights from bridges.

Annex A – Glossary

- 6.115 It was recommended that the Strategic Flood Risk Assessment should be included within the Glossary.

Sustainability Appraisal

- 6.116 Would be useful as well as highlighting the SA objectives which the Core Strategy supported to also clearly identify actual or potential problems /conflicts. One person suggested that the conflict of economy and sustainability should be identified as a key issue. Requests were also made for more explicit recommendations to be included regarding the development of evidence.

Appendix 1: Sustainability Appraisal



City of York

LDF | Local
Development
Framework

Core Strategy
Issues and Options
Sustainability
Appraisal

June 2006

Foreword

The purpose of Sustainability Appraisal is to promote Sustainable Development through the better integration of sustainability considerations into the preparation and adoption of plans.

The Sustainability Appraisal report will be an integral part of the plan making process, and will be undertaken in stages alongside the production of each Local Development Document.

Section 39 of The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of Sustainable Development.

The preparation of the Local Development Framework must also be in accordance with the European Union Directive 2001/42/EC (known as the Strategic Environmental Assessment, or SEA, Directive) which requires formal Strategic Environmental Assessment of certain plans and programmes which are likely to have significant effects on the environment. The Directive has been incorporated into English law by virtue of the Strategic Environmental Assessment Regulations 2004, and applies to all Local Development Documents where formal preparation begins after 21st July 2004.

All Development Plan Documents and Supplementary Planning Documents will therefore be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). Although the requirement to undertake SA and SEA is distinct, it is possible to combine them into a single appraisal process. It should therefore be taken that references to the SA process also incorporate the requirements of the SEA Directive.

This Sustainability Statement considers the key sustainability issues arising from the Issues and Options document produced for the Local Development Framework Core Strategy. It should be read in conjunction with the Core Strategy Issues and Options paper as part of this consultation exercise.

Any comments on the Core Strategy and Sustainability Statement should be returned by 21st July 2006 to:

LDF Core Strategy Issues and Options
City Development
City Strategy
City of York Council
FREEPOST (YO239)
York YO1 7ZZ

E-mail: citydevelopment@york.gov.uk

**City of York Local
Development Framework
Core Strategy
Issues and Options**

Sustainability Statement

June 2006



Introduction

1. This note summarises the key sustainability matters arising from the Issues and Options document produced for the City of York Local Development Framework (LDF) Core Strategy. This note has been prepared by Baker Associates for City of York Council as part of the sustainability appraisal process of the LDF.
2. Preparing a sustainability appraisal report at this stage in the appraisal process is not a formal requirement of the sustainability appraisal process. The note is therefore only intended to provide a brief overview of the implications of the approach to the Core Strategy that is indicated by the Issues and Options as far as they relate to sustainable development. The main purpose of the note is to inform the next stages of preparation of the Core Strategy, which will include further participation work. The matters raised in this summary note should be taken into account in moving forward with the preparation of the LDF and any further consideration of Issue and Options for the Core Strategy.
3. This note uses a definition of sustainable development, and what this means for the City of York, taken from the sustainability objectives developed for the sustainability appraisal by City of York Council and reported in the 'Scoping Report' (August 2005). These are shown in table 1.

Table 1: Sustainability objectives taken from the City of York Local Development Framework Sustainability Appraisal Scoping Report (August 2005)

Headline sustainability objectives	
Environmental	
EN1	Land use efficiency that maximises the use of brownfield land
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change
EN5	Improve Air Quality in York
EN6	The prudent and efficient use of energy, water and other natural resources
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling
EN8	Maintain and Improve Water Quality
EN9	Reduce the impact of flooding to people and property in York
Social	
S1	Preserve and enhance York's urban and rural landscapes and public open space
S2	Maintain or improve York's noise climate
S3	Improve the health and well-being of the York population
S4	Safety and security for people and property
S5	Vibrant communities that participate in decision-making
S6	Accessibility to public recreational areas and leisure facilities for all
S7	Reduce the need to travel by private car

S8	Good access to and encourage use of public transport, walking and cycling
S9	A transport network that integrates all modes for effective non car based movements
S10	Quality Housing available for all
S11	Social inclusion and equity across all sectors
Economic	
EC1	Good quality employment opportunities available for all
EC2	Good Education and training opportunities which build skills and capacity of the population
EC3	Conditions for business success, stable economic growth and investment
EC4	Local needs met locally

General comments

4. Overall, the Issues and Options document contains many policy approaches that should help ensure that new development is compatible with the objectives of greater sustainability.
5. In moving forward with the Core Strategy it may be necessary to redress the balance between core issues and other detailed matters. The Core Strategy should seek to cover key matters such as the spatial and strategic policies that will direct the scale and location of sustainable growth in the City of York. This primarily means setting out the issues and the options for the location of new housing and employment land as part of a spatial strategy for the area encompassed by the LDF. Other, more detailed, matters can be dealt with through more specific parts of the LDF, such as the Development Control Policies Development Plan Document (DPD) or Area Action Plan DPDs.

Vision and objectives

6. The proposed vision and objectives for the Core Strategy are adapted from those used in the 'Without Walls' Community Strategy for the York LDF area. This approach is compatible with the approach to LDF preparation advocated by Government, in that the LDF is a key tool in the delivery of the Community Strategy, and therefore the LDF should support, and build on the objectives of the Community Strategy by taking forward the spatial implications of the objectives in particular.
7. Creating a 'sustainable city' is the overarching vision for the future of York, and this approach is welcomed by the sustainability appraisal. The spatial planning objectives developed from the Community Strategy are generally compatible with the sustainability objectives developed for the sustainability appraisal. As these LDF objectives are aspirational, it is not possible to say what their impact would be on the achievement of the sustainability objectives, as the effects of the objectives will not be apparent until they are implemented through the strategy, policies and proposals of the LDF.
8. The objectives appear quite comprehensive in their coverage of issues, although it may be necessary to reconsider the wording of objective 4 to ensure that this is sufficiently defined to emphasise the protection of the natural environment. Three of the objectives contain the term 'sustainable',

care needs to be taken in using the term too frequently in this way. It is clear sustainability is a key theme of the approach City of York Council would like to take to the LDF. However, using the word too frequently, without ensuring it is appropriately defined in each case, may slightly devalue the term, as it allows too great an interpretation of what this means in each circumstance. Therefore it is recommended that these objectives are re-written to remove the word 'sustainable' and more closely define what is intended from the objective. This is already the case in the Without Walls vision points for the Community Strategy.

9. The objectives alone will not have an impact on the future sustainability of the York area. Although the LDF objectives are compatible with achieving more sustainable development, an appropriate strategy and policies are needed to ensure these objectives can be reached and development is implemented appropriately.

A sustainable spatial strategy for York

10. Chapter 4 of the Issues and Options Report for the Core Strategy is entitled 'sustainable spatial strategy for York'. The greatest influence a development plan can have over the degree to which a contribution is made towards the achievement of sustainable development is through the provision it makes for the development needs of the area, and through the spatial strategy that seeks to manage change and the interaction of activity and movement to help bring about desirable social, environmental and economic conditions.
11. In establishing a fuller consideration of the strategic spatial approach for development in the City of York, it is suitable for the Core Strategy to address matters such as the role, scale and location of development, and how this can be provided in the most sustainable way in the LDF area. In moving forward with the Issues and Options for the Core Strategy, and selecting a preferred option, it is essential that the policy alternatives are presented in sufficient detail. The information provided in this chapter of the document provides a useful starting point for identifying spatial alternatives and developing the Core Strategy. These alternatives should include identification of the broad locations of development, and the level of growth envisaged. This is essential in order for the sustainability appraisal to fully consider the relative sustainability implications of these, and help in selection of the most appropriate alternative.
12. In proceeding with the selection of strategic spatial alternatives for the Core Strategy matters with potential significant sustainability implications need to be addressed. Matters that should be considered in producing such as strategy are:
 - what the future role of key settlements is to be, and its place in the region, and what the roles of other settlements in the District are to be
 - the needs of the place and of the community that are to be met, identified from the RSS, the community strategy and from the evidence base
 - how the possible roles sought for settlements are to be brought about, including through the use of appropriate development

- how the scale of development identified through the RSS can be accommodated in different ways (such as between different types of settlements, within the urban core in different scenarios of opportunity mix and density, and in smaller settlements)
 - the broad location and form of urban extensions that may be required
 - the use of green belt policy, as a strategic policy tool, and with the need under current policy for a boundary to be defined for the plan period and beyond.
13. These matters reflect the overall need for the selected preferred spatial approach to be compatible, and make a contribution towards, more sustainable development in the City of York, and help positively shape the future of the area. This leads to a conclusion that further work may be necessary on the identification of suitable alternatives, and for the City Council to produce further material on these to allow public discussion of these approaches. This could build on the outcome of the consultation on the Issues and Options document which could be used to help identify and highlight these possible strategic alternatives. This will also allow a sustainability appraisal to identify sustainability impacts of these options, in line with good practice and the requirements of the Strategic Environmental Assessment Directive.
14. The sustainability appraisal recommends that the Core Strategy needs to carefully consider how the process of preparing the LDF, and its strategy, will be taken forward from this Issues and Options document to the selection of preferred options. An essential part of this is to ensure that when moving forward with the LDF preparation the principle of 'frontloading' is adopted; that is one of dealing with the 'big' issues that require the critical decisions early in the process, recognising that these shape the plan, and that other matters that are essentially matters of detail can be dealt with following the identification of the strategic approach. This will also allow the more detailed development control policies to tie in with the strategy, to ensure an integrated approach to plan making. It will also be necessary for the participation process that the Council engages in, as part of the moving forward with the identification and selection of alternatives to allow the generation and debate of alternative approaches. This will be important so as to ensure that all have the opportunity to have an input into the discussion of alternative approaches.
15. A final point to note is that creating and consulting on strategic alternatives for the core strategy is not only important in terms of good practice, but also in order to ensure that LDF preparation fulfils 'soundness' expectations at Independent Examination stage.

Sustainable design and construction

16. The matters addressed in this section of the Issues and Options paper are associated with ensuring new buildings are designed in such a way as to contribute to their surroundings, be energy efficient, constructed in ways that minimise waste, and also that they are designed to remove opportunities for crime.

17. These objectives are highly compatible with sustainable development. In particular those issues relating to energy efficiency and more careful consideration of resource consumption matters, relate well to sustainability objectives and the goal of the City of York Council to reduce its 'ecological footprint'.
18. The 'Key Issues and Options' presented here are appropriate, in helping to set policy to achieve a high standard of design and sustainable construction. Prioritising matters relating to sustainable construction, including creating more resource efficient buildings, is an ever increasing area over which the LDF should take the lead in setting out expectations for development in the area. It may be suitable for the LDF to consider including policy that requires that new development meet defined sustainable construction standards, such as those defined by Eco-Homes and BREEAM tools. It may also be suitable for the LDF and the Core Strategy to consider how buildings can be designed to take into account the effects of climate change. Key to this should be ensuring that the long-term future of buildings and their resource consumption are considered and designed into buildings. Summers are likely to become hotter, and therefore homes should be designed that can stay naturally cooler, and do not require resource-inefficient artificial air-conditioning.
19. It may also be suitable to consider how buildings should be designed in areas that may be at risk of flooding, as climate change is likely to cause more storm events, and higher winter rainfall, that may contribute to this risk. Water efficiency technologies in new homes are also an important consideration, as the Sherwood sandstone aquifer to the east and south of York already suffers 'excessive summer depletion' (RSS submission version Jan 2006), and with annual reduction in rainfall a likely effect of climate change, this may worsen.

Proposals should help to deliver the following sustainability objectives: EN2, EN4, EN6, EN7, S1, S4

Housing

20. Determining the distribution and development of housing in the City of York is one of the key areas that the LDF can have an impact, and help to achieve more sustainable development. Matters relating to the strategic distribution of housing are dealt with earlier in this report, however ensuring that housing development is suitably located to reduce the need to travel is also part of the considerations here.
21. The Core Strategy Issues and Options proposes that development will primarily be located on previously developed land, and this should help to ensure the efficient use of land and the reclamation of derelict and disused sites. This is in keeping with national policy, as well as with some aspects of the sustainability agenda. Recent development figures of the City of York show that in 2003/4 90% of development was on previously developed land. Continuing with this trend is compatible with sustainable development objectives as it helps to ensure the efficient use of land and reduce the need for the development of greenfield land, and may also help improve the built environment through land remediation. However, this will also be reliant on suitable sites being available particularly in relation to land at risk of flood,

protection of the historic environment and the remediation of contaminated land.

22. The need for an appropriate mix of housing type is also highlighted as an issue for consideration in the Core Strategy. Ensuring that housing is built to meet identified size needs will help achieve sustainability objectives relating to a home for all. Providing one and two bedrooms could also help to provide affordable market housing in the City. Although it will also be important to ensure that housing is built to meet needs, such as the provision of family homes of three or more bedrooms. As part of this larger new residential sites should be encouraged to contain a mix of house sizes and types, to accommodate diverse types of household including first time buyers and families, could help encourage community cohesion. For the most efficient use of land ideally the size of new homes should be kept as low as possible, although also in line with identified needs, so as not to encourage the under-occupancy of new homes. As proposed in the Issues and Options document decisions on the appropriate size of new homes should be based proper survey evidence.
23. The provision of affordable housing is also a key component of meeting sustainable objectives in relation to housing. It is identified that in York there is a lack of affordable homes, with average house price more than doubling from 1999-2004. The Issues and Options document sets out the approach that will be taken in the Core Strategy to ensure a supply of affordable homes. The RSS submission version January 2006 states that 40% of new homes on sites of over 15 dwellings (or over 0.5ha) should be built as affordable. The LDF will have to support this approach, however, it may be suitable to set higher targets given the lack of affordable homes in the area, provided justification can be provided from the evidence base, and this would help meet relevant sustainability objectives.
24. The Key Issues and Options document also covers potential issues and suggested policy approaches for a range of other housing types, including students, the elderly, those with disabilities, and gypsies and travellers. Addressing the needs of these groups through the LDF can help to achieve housing related sustainability objectives, though there are limits to the extent to which these issues can and should be addressed by the Core Strategy.
25. The 'Key Issues and Options' box at the end of section 6 of the document sets out the general approach to housing, reflecting the needs of groups and detailed in the preceding paragraphs of this report. However, the initial bullet point on the location of new development is a matter that will primarily be dealt with in the spatial strategy of the Issues and Options document. Furthermore, it should be the aim to locate all new housing and not only family housing in accessible locations.
26. This box also sets out some policy approaches to housing, based on four policy considerations. From the point of view of achieving more sustainable development, these are welcomed as they support the sustainability objectives of making the efficient use of land, the provision of a home for all, and developing homes of various types to meet needs. The main consideration should be on the most efficient use of land, through re-assessing allocations and building at higher densities.

27. **Revisit employment land allocations, where sites may be better suited to brownfield housing development**
This approach allows the more efficient use of land, by re-assessing employment sites it may be possible to identify those that are surplus to requirements, and/or do not appear to be coming forward for development, and re-allocate for housing. As long as this re-allocation is based on a thorough understanding of the long-term employment needs of the area it should not harm meeting economic sustainability objectives. It may be suitable to state that development will be prioritised on previously developed land, subject to environmental constraints, in all situations.
28. **Maximise the potential for new housing (with associated amenity provision) on sites with good transport links, through building at higher densities**
In accessible locations, particularly near railway stations and transport interchanges, development at high densities is most suitable, and should ensure the most efficient use of land. It also should ensure that new residents can make best use of more sustainable modes of transport, with the aim of reducing car use and allowing equitable levels of access for all. The LDF, including the Core Strategy, should set a requirement for high densities at these locations. In addition, densities throughout the LDF area should be as high as possible, subject to accessibility considerations and good urban design principles, with some limitation where existing accessibility is poor and where there may be good reason to follow the existing development character.
29. **Provide different types of housing to meet the requirements of particular groups**
This should help ensure an equitable access to housing for all. As part of this it may be suitable to consider the needs for homes that can adapt to changing needs over a lifetime. Ensuring that new development contributes to the supply of affordable homes to accommodate those on lower incomes, and first time buyers, is also an important inclusion here.
30. **Provide a mix of housing on sites to avoid concentrations of a single use**
Providing a mix of types and tenures of homes on larger sites for example including homes for: the elderly, young people, families, people with low incomes, and private market development, could help to achieve more mixed communities.

Proposals should help to deliver the following sustainability objectives: EN1, S5, S7, S8, S10, S11, EC3

Economy and Employment

31. One of the key roles of the LDF is to determine and distribute an appropriate level of land for business within the City in order to bring about sustained economic growth. As with housing, the location of employment land can have a substantial impact on establishing travel patterns in the area and reducing peoples' need to travel. As reducing the length and amount of trips people make to meet everyday needs is a key component of delivering more sustainable development.

32. The strategy for the economic development of the City of York aims to build on the existing strengths of the area to bring about greater economic prosperity, and contribute to the economy of the sub-region. This includes developing Science City York, based on leading edge knowledge and science-based business, as well as a key tourism centre. The document also identifies key areas of economic growth in the LDF area, these include the redevelopment of York Central for a mix of uses including employment. This development, due to the central location and close proximity to the railway station, shops and other services, is likely to have positive benefits against a range of sustainability objectives, particularly by reducing the need to travel, and regenerating an area of central York and therefore bringing improvements to the built environment.
33. Through studies carried out for the City of York Local Plan it was agreed that the economy of York should continue to grow and provide more jobs in the future, but overtime fall in line with the growth levels of a better performing UK economy by 2021. This was identified as the 'medium' growth rate. Giving a projected increase of jobs in York of 19,000 from 2000-2021. These jobs would therefore have to be accommodated within the area and employment land allocations made in the Local Plan. However, monitoring evidence has shown that the take-up of employment land is not coming forward at the levels expected. Although the number of jobs has increased, much of the increase has taken place within existing developed sites. The Issues and Options document identifies almost 36ha of premier employment land yet to be granted planning consent in out of centre locations of York, and almost 12ha of standard employment land that is still awaiting planning applications. Therefore the Key Issues and Options for this section of the document identifies that the overprovision of employment land is one of the main issues that must be dealt with here. Three proposed options for this matter are set out, although these options are not mutually exclusive.
34. Two of the options presented set out an approach that would see a review of employment sites that have yet to be developed, to establish whether they are surplus to requirement and/or in unsuitable locations. These could then be re-allocated for alternative uses, including housing, or de-allocated as appropriate. This approach should lead to the more sustainable and efficient use of land by re-allocating for more suitable uses. This could be enhanced by promoting more efficient use of existing employment sites and allowing intensification in these locations to provide greater job densities. It may also allow employment sites in more central or accessible locations to be re-allocated for housing.
35. The third option approach would see the LDF contain planning policies/guidelines to ensure employment sites that are more compatible with sustainability objectives are prioritised. Sites could also be reserved for their identified purpose (such as for Science City York), through LDF policy. This approach is also welcomed in terms of achieving more sustainable development, as it shows a commitment to making sure that employment sites are in more sustainable locations, which may also help reduce the need for travel. Ensuring that each employment site is developed for the specific role for which it has been identified will help meet economic sustainability objectives in the area, by helping to preserve the conditions for business success.

36. The three options presented do not necessarily represent alternatives, as all three approaches can be bought forward simultaneously. This should help ensure that land within the LDF area is used in the most efficient way, preserving high quality employment land, and allowing other sites to be re-allocated. Past monitoring evidence has shown an oversupply of land for employment, and therefore this approach should help address this, whilst not harming the economic growth potential of the area.

Proposals should help to deliver the following sustainability objectives:
EN1, EC3

Retail

37. The Issues and Options document sets out the background to shopping and the retail offer in York. York currently performs well as a sub-regional shopping destination, although there is competition from nearby Hull and Leeds. Deciding the future level of retail need in the area is a matter that must be addressed through the LDF so that it can be accommodated through allocations and policy.
38. The Key Issues and Options for retail consider two main matters that need to be considered for the Core Strategy in relation to retail. Firstly the level of 'retail growth' that should be accommodated in the area in the LDF timeframe, and secondly the 'location of retail development' and criteria for establishing priority areas for retail growth.
39. The three growth scenarios for retail growth were developed in the York Retail Study (Roger Tym and Partners, October 2004), to estimate the additional shopping space needed in the City of York until 2016. The three alternative growth scenarios identified are 'static market share', 'rising market share' and 'falling market share'. The Local Plan adopted a 'rising market share' approach that would require 43,200 square metres of additional non-food shopping space in two phases to 2016. The following is a brief summary of the sustainability implications of each of the three scenarios, based on the key considerations for each approach.
40. **Scenario A: Static Market Share** – this option would require a growth of around an additional 30,800 square metres of retail floorspace to 2016. This scenario would see York maintain its market share, and its role as a supporting sub-regional shopping centre, providing a range of retail opportunities to meet a variety of needs. The land requirements mean it will be relatively straight forward to accommodate this level of growth, with sustainability implications only really relating to the land take needed to achieve this, and also dependant on the location of this growth.
41. **Scenario B: Rising Market Share** – this option would require around an additional 43,200 square metres of retail floor space to 2016. This option sees York raise its regional retail role, and increase its market share of available expenditure, including a claw back of some of the loss York has experienced from a previous retail survey of 2000. This option may create extra pressure on York infrastructure within the city, particularly given the constraints of the walled city centre. If the level of growth this scenario requires had to be situated in less central locations, such as on the periphery of the city it would lead to unsustainable travel patterns and would not be

compatible with sustainable development. However, if this could all be located in centre or easily accessible edge of centre locations it could bring economic advantage to the area. In terms of sustainable retail growth it is beneficial to see a higher proportion of the retail spend of City of York residents retained in the City, however it would not be compatible with sustainable development if York continues to draw shoppers from further afield without first ensuring that sustainable transport modes are in place to provide a viable and attractive alternative to car use.

42. **Scenario C: Falling Market Share** – even this option would require additional land for retail, with around 22,200 square metres to 2016. This approach would see York receive less percentage market share than at present, and this could have negative effects on the city centre, and potential economic harm to the area, as the retail role of York is currently a key asset and complements the tourism role. In addition, as demand for retail space in York is likely to remain high this would mean the loss of economic opportunities to other centres, and potentially unsustainable travel patterns if residents have to go to more distant cities to meet their retail needs. This scenario is also less likely to be able to support any growth of district centres.
43. The Key Issues and Options pose the question as to which growth strategy is most suitable to pursue in the LDF, up to 2011 and then until 2016. The current Local Plan is aiming to meet the 'rising market share' approach up to 2011, and therefore may be the most suitable approach to proceed with to that date. Monitoring of growth should indicate whether this approach is suitable, and what the likely market share may be by 2011. Following 2011 it is not possible to say which growth rate may be best in terms of sustainable development, as the capacity of the City to accommodate high retail growth rates sustainably will depend on the continued availability of suitable sites for new retail development. Monitoring may indicate whether it is more suitable to switch to a lower growth rate after 2011, which may be particularly important if existing growth is leading to unsustainable travel patterns.
44. The location of retail development is the second matter that is covered in the Key Issues and Options in this section of the document. Five approaches by which the location of retail development in the City of York could be guided are set out in the Key Issues and Options box. These approaches are not mutually exclusive and could be delivered together in some situations, and in hierarchical approach in others. The first approach seeks to maintain York City centre as the focus for retailing, and this is in line with national and regional policy. Supporting retail development in this location is most suitable as it is most accessible to the maximum amount of people by public transport, both who live the City and in the surrounding rural areas, as well as providing a mix of services so more needs can be fulfilled in a single trip. The City centre should also be the focus for a new high profile department store as this is the only suitable, and sustainable, location for this type of high trip-generating shop.
45. The second locational approach states that retail development should be encouraged at edge of centre locations. In terms of sustainability this is the second best option for retail, given that these areas may be relatively less accessible by public transport. Therefore in terms of sustainability these areas should only be the focus if there are no sites in the centre, and there is strong need for the proposed type of development. Thirdly, an approach is put forward to concentrate on district centre retailing. The retail role of these

areas should be secured to ensure the shops offered are predominantly to serve local needs, and supported to ensure that these areas are reserved for retail use of a type and scale suitable to the location.

46. Location approach four states that areas outside the City Centre should be identified for retail growth. This approach is the least sustainable in terms of encouraging trips, the majority of which are likely to be by private transport. The LDF should only aim to identify such sites where a proven need has to be met, and in those situations it should also seek to ensure these are in locations where access by public transport, walking and cycling are real and attractive alternatives to people using their car.
47. The final location approach seeks to identify areas that are in need of local convenience shops, so where this can hope to be provided by the LDF. This is a good intention, as local shops reduce the distance people need to travel for essential goods, and are likely to be accessed by many people on foot. However, how this criteria will be implemented through the Core Strategy of the LDF is not clear.
48. Overall, the approaches put forward for retail in the Issues and Options document are compatible with sustainable development. However, the overall growth of retail and new floorspace should be based on needs, and the ability for York to accommodate these facilities sustainably without the need for unnecessary use of greenfield land, or development in locations only easily accessible by private transport modes. Therefore priority for all types of shop must be given to city centre in line with national policy.

Proposals should help to deliver the following sustainability objectives: EN1, S7, S11, EC3, EC4

Culture and Tourism

49. This section sets out the issues relating to the provision of cultural facilities, and well designed public open space and the existing tourism industry in York. York has a strong existing tourism role, with many attractions of national quality. This is a significant component of the economy of the area and every attempt should be made to increase the economic value of this industry, subject to capacity issues and possible environmental consequences.
50. The approach put forward shows a clear compatibility between the desire to improve the cultural performance and quality of central York, and the need to encourage visitors to stay overnight in York to increase tourism revenue.
51. The Key Issues and Options in this section include a number of proposed policy approaches that could be taken to achieve these goals. These include improvement to the public spaces in York, including access to the rivers, and public art. All these schemes could help meet sustainability objectives relating to cultural heritage, enhancing the built environment, and community identity. These, with additional criteria for a new hotel, development of the 'evening economy', and 'cultural quarter' could also help to improve tourism and encourage more people to visit and stay in the area, helping meet economic objectives. The objective of achieving a higher spend of the existing tourists, by encouraging overnight stays, rather than increase the

overall number of tourists in York is positive in terms of sustainable development objectives. This approach hopes to achieve higher economic returns without putting extra tourist pressure on existing tourism destinations in and around the city centre, and also does not encourage more trips to the city which may be unsustainable in terms of increased car travel and parking needs.

Proposals should help to deliver the following sustainability objectives: EN2, S1, S6, EC3

Community Facilities

52. This section of the Issues and Options document sets out in detail issues relating to leisure facilities, education facilities, health facilities and emergency facilities.
53. The LDF should take into account the need for new facilities of these types in making allocations and choosing a policy approach. The LDF can have some influence on these matters, by setting out matters of strategic importance, finding suitable locations, protecting existing facilities from development and in some circumstances setting out approaches to secure these facilities from developers. However, there are many matters that are beyond the control of the LDF, such as funding and budgetary considerations, and these matters are likely to have the greatest impact on services such as education and healthcare.
54. The policy approaches set out in this section are not always limited to those matters that are most relevant to the LDF, however, taking a joined up approach by considering other influences may be appropriate.
55. **Leisure facilities:** It is important that the approach that is taken to providing new leisure facilities and open space is based on an understanding of existing needs and provision. Identifying this would be an important first step in setting policy here, and this may help identify any existing sites that are surplus and could be suitable for redevelopment to ensure the efficient use of land. The approach taken here is compatible with sustainable development objectives relating to health and community wellbeing.
56. **Education facilities:** What is advocated here is based around the need to identify any surplus capacity or areas where there is a deficit in school facilities, taking into account current need and future demographic changes. Identifying surplus capacity may enable school sites to come forward for alternative uses, although it may be desirable in terms of sustainability to retain some community or open space use on redundant school sites.
57. Other criteria seek to extend the use of school buildings for community uses at times when schools are not in use, this should ensure the more efficient use of land by combining the use of sites. There is also a proposed policy approach to support higher and further education facilities in the City, and this should help to achieve sustainability objectives relating to skills, as well as those relating to the economy. However, any such proposals for new development will need to take into account sustainability objectives relating to the protection of the environment.

58. **Health facilities:** The approach here is simply to support provision of hospital services, with likely consequent benefits for sustainability objectives relating to health.
59. **Emergency facilities:** This seeks to enable facilities for emergency services to be appropriately located in the LDF area, and is compatible with sustainable development.

Proposals should help to deliver the following sustainability objectives:
EN1, S3, S6, S11, EC2, EC3

Historic environment

60. The historic character, sites and buildings of York are one of the area's key assets, that make the city an attractive place to live and work in, and to visit, and so make a significant contribution to the area's economy.
61. The approach proposed in the Key Issues and Options for this section of the document seeks to retain the historic character in the area by ensuring new development is of suitable quality. The advocated approach is compatible with sustainable development objectives, and allows for new development to be of innovative design, if desired, rather than seeking to preserve the historic character in an unchanging way, allowing the character and architecture of the city to grow and evolve.

Proposals should help to deliver the following sustainability objectives:
EN2, S1

Natural Environment

62. This section of the Issues and Options document sets out the approach that will be taken in the LDF and Core Strategy on the protection of natural environment. This includes biodiversity conservation and enhancement, and the protection of landscapes and the features they contain.
63. The wider area of the City of York beyond the built up area boundaries contains a range of habitats designated for their biodiversity importance. This includes two areas identified as being of international importance for nature conservation, and identified under European biodiversity legislation.
64. The Key Issues and Options approach suggests a policy approach for protecting the natural environment of the City of York. The criteria included are compatible with sustainable development objectives, however, it may be more suitable for the LDF to take an approach that seeks to conserve the wider biodiversity, and particularly landscape, resource of the area, rather than seek to identify and designate new sites, unless they can be shown to be of particular local importance. This may be particularly important in seeking to preserve the nature conservation value on previously developed sites that may have become locally important for wildlife, and therefore the need to retain or compensate this through new development. The same point applies to the protection of landscapes, where it will be important to protect individual features that provide distinctive character, rather than seek to designate areas of local importance for landscape.

Proposals should help to deliver the following sustainability objectives:
EN2, EN3, S1

Sustainable transport

65. Providing a 'connected' LDF area in terms of public transport accessibility is one of the key ways in which it can have a positive impact on achieving more sustainable development. Continuing to support more sustainable travel modes and routes is, in part, reliant on the layout and location of high trip generating new development, and in particular large scale new housing and employment development, as well as retail and community facilities. With all new development of this type it is vital that public transport accessibility, walking and cycling is taken into account from the outset so it is a fundamental component of the scheme. This is in terms of design and also ensuring relevant budgets include sustainable transport considerations. The overall intention of planning for more sustainable development is to make these modes a real and attractive alternative to car use, and ensure accessibility to jobs, homes and services is equitable for all.
66. The approach put forward in the Key Issues and Options in this section of the document sets out a combined approach to increase public transport use, building on the already growing use of buses in York, and reducing demand for car use. Achieving more sustainable travel will help meet many sustainability objectives, including air and health benefits for the people of York. In addition to policies on more sustainable transport, this will need to be supported by a sustainable spatial strategy for the location of new development.

Proposals should help to deliver the following sustainability objectives:
EN4, En5, EN6, S3, S7, E8, E9, EC3

Waste and Minerals

67. There are both strategic and site specific considerations relating to waste management and to minerals quarrying and use. The Issues and Options document sets out national policy in regard to these matters, and interprets these to what this may mean to development in the City of York.
68. In relation to both water and minerals, the main aims are to reduce the consumption of primary resources, and avoid the final disposal being to landfill.
69. The Key Issues and Options Report sets out an approach to waste management that would aim for waste minimisation and re-use, the LDF would have the most control over this related to construction and demolitions. Therefore construction waste should be kept to a minimum through construction planning, these matters concur with sustainable construction approaches advocated under the BREEAM toolkit (see paragraph 18). The LDF could also take an approach that the refurbishment of buildings should be prioritised over demolition and redevelopment where practicable in order to save primary resources, subject to compatibility with other sustainability considerations.

70. The LDF Core Strategy will also have a key role to play in determining where new waste sites should be located. However, there is no indication in the document what the need for waste sites will be in the LDF area, and no real options can be drawn up for the location of these facilities. Without more detail on the need it is not possible to say, with any certainty, the effectiveness of policy. If any new large waste management facility is proposed to be built in the LDF area over the plan period it may be suitable to set out possible locations for this as early as possible so that these can be tested through the LDF process and to be able to evaluate the potential effects with other proposed development. The Key Issues and Options for waste do include three guiding principles for the location of new facilities, which should help to ensure suitable locations are identified. However it may be suitable to include an additional criteria on the need to ensure that these facilities do not adversely impact on residential amenity.
71. The Key Issues and Options for minerals sets out an approach that will only allow new planning permissions for mineral exploitation where a need is proven, and there is shortfall in the resource. It is hoped that policies on the reuse of construction and demolition wastes should help reduce the demand for primary mineral resources.

Proposals should help to deliver the following sustainability objectives:
EN6, RN7

Environmental Protection

72. This section deals with issues relating to air quality and noise pollution in the City of York. An Air Quality Management Area (AQMA) has been identified in central York, where poor air quality is being caused by high traffic levels. Noise pollution from a variety of source, including industry and traffic, is an important matter to consider in deciding on the location of new development that would be a source of noise or may be a sensitive receptor.
73. The Key Issues and Options set out possible approaches for tackling these issues in the LDF area. This includes possible zoning system based on levels of noise or air pollution that will guide development accordingly, this could include areas 'at risk' from adverse levels of pollution. This approach may prove useful in ensuring that new potentially polluting development is kept away from sensitive receptors, such as hospitals or schools. However, if such an approach was pursued it would have to be made sure that this means that areas outside designated zones were not adversely affected by a concentration of polluting development. Identifying areas where potential problems may arise may help to prevent pollution in these areas, which may be easier than trying to reduce pollution after the effects have been felt.
74. The AQMA is already a defined 'zone' for air quality management, and this, alongside policies on more sustainable transport, should help reduce impacts in these areas.

Proposals should help to deliver the following sustainability objectives:
EN2, EN5, S3

Renewable energy

75. There is a need for North Yorkshire, including the City of York, to contribute to meeting defined regional renewable energy needs by 2021 – with the first target date of 2010. These targets are based on the percentage of energy used that comes from renewable resources. Therefore, to meet these targets there needs to be an increase in energy generation from renewable sources, though the primary consideration is to reduce overall energy consumption by ensuring the more efficient use of energy.
76. The Key Issues and Options for this section of the document set out an approach to the use of energy and the ways in which this can be achieved. This includes reducing need and more efficient use. Many of these matters have already been addressed in other sections, such as the more sustainable and efficient design of new buildings, and increasing the use of sustainable transport. The approach set out is suitable in encouraging more sustainable energy use from more sustainable sources. However, it may be suitable to treat energy efficiency and reducing demand as the overriding consideration, fundamental to achieving other outcomes.
77. The second issue highlighted shows the possible sources of large scale renewable energy generation in York, and it will be important for the LDF to support schemes of this type, unless there are overriding environmental constraints.
78. It is very likely that a significant proportion of the renewable energy generation in the future does not come from National Grid schemes, but instead is part of on-site provision to meet on site need. This approach is also more energy efficient as there is not such a loss of energy during transmission, and does not have the peripheral environmental impacts such as the need for power lines. It is suitable for the LDF Core Strategy to clearly set out as a strategic issue the need for new development, above a threshold size, to deliver a proportion of energy from renewable sources. It is up to those preparing the LDF to set out what the threshold size level of this type of development might be, as well as the percentage that should be from renewable sources, and from the point of view of achieving more sustainable development these should be, respectively, as low as possible and as high as possible.

Proposals should help to deliver the following sustainability objectives: EN4, EN6

Summary and conclusion

79. The Issues and Options document covers a range of topics, and sets out the policy approach that will help to ensure new development in the City of York is compatible with sustainable development objectives. However, in moving forward with the preparation of the Core Strategy the sustainability appraisal identifies a need for further work to be carried out on identifying alternative spatial strategy approaches to development in the area. This should add a further level of detail to the material already available, and include matters such as alternatives for the broad location of new development, as well as information on the scale of new development in the area, and the roles of York and the other settlements of the district. This will allow for further public discussion of alternative approaches, in line with proper plan making, and the

sustainability appraisal of alternatives to help in the selection of the preferred options.

80. The balance of the Issues and Options document includes some matters that may be better included in a development control policy DPD. However, overall the approach put forward for these matters is compatible with the aim of achieving a greater level of sustainable development in the City of York. Many of the issues covered are highly compatible with the sustainable development objectives developed for the SA process and together may help in achieving the vision of a more sustainable city, and a reduced 'ecological footprint' for York.

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Appendix 2: List of Consultees - List of those consulted on Core Strategy

Statutory Consultation Bodies:

- Deighton Parish Council
- Heworth Without Parish Council
- Department for Work & Pensions
- Department for Constitutional Affairs
- Department for Media, Culture & Sport
- Office of Government Commerce
- Hessay Parish Council
- Haxby Town Council
- Fulford Parish Council
- Elvington Parish Council
- British Telecom
- Dunnington Parish Council
- Huntington Parish Council
- Copmanthorpe Parish Council
- Clifton Without Parish Council
- Bishopthorpe Parish Council
- Askham Richard Parish Council
- Askham Bryan Parish Council
- Acaster Malbis Parish Council
- Selby & York Primary Care Trust
- Heslington Parish Council
- English Heritage Yorkshire & The Humber Region
- British Gas East Yorkshire District
- Earswick Parish Council
- Rufforth Parish Council
- Yorkshire Water
- York Health Services NHS Acute Trust
- Tees, East & North Yorkshire Ambulance Service NHS Trust
- City of York Council
- York Consortium of Drainage Boards
- Network Rail London North Eastern
- Wiggington Parish Council
- Wheldrake Parish Council
- Upper Poppleton Parish Council
- Strensall & Towthorpe Parish Council
- Holtby Parish Council
- Skelton Parish Council
- Powergen Retail Ltd
- Rawcliffe Parish Council
- Nether Poppleton Parish Council
- Murton Parish Council
- Kexby Parish Council
- DEFRA
- Ministry of Defence
- Home Office
- Department of Trade & Industry
- Transco Plc
- Naburn Parish Council
- Stockton on the Forest Parish Council
- Yorkshire & Humber Assembly
- Escrick Parish Council
- Thorganby Parish Council
- Murton Parish Council
- Colton Parish Council
- Shipton Parish Council
- Huby Parish Council
- North Yorkshire County Council
- East Riding of Yorkshire Council
- Selby District Council
- Harrogate Borough Council
- Hambleton District Council
- Acaster Selby & Appleton Roebuck Parish Council
- Yorkshire Forward

- Bilborough Parish Council
- Kyle & Upper Ouse Internal Drainage Board
- Appleton Roebuck & Copmanthorpe Internal Drainage Board
- Ouse & Derwent Internal Drainage Board
- Foss Internal Drainage Board
- Acaster Internal Drainage Board
- Marston Moor Internal Drainage Board
- Highways Agency
- Yorkshire Forward (York)
- Natural England North Yorkshire Team
- Environment Agency
- New Earswick Parish Council
- Osbaldwick Parish Council
- Ryedale District Council
- Government Office Yorkshire & Humber
- East Cottigwith Parish Council
- Countryside Agency
- Sutton upon Derwent Parish Council
- Overton Parish Council
- Newton on Derwent Parish Council
- Stillingfleet Parish Council
- Catton Parish Council
- Stamford Bridge Parish Council
- Gate Helmsley & Upper Helmsley Parish Council
- Warthill Parish Council
- Sheriff Hutton Parish Council
- Harton Parish Council
- Flaxton Parish Council
- Copmanthorpe Parish Council
- Long Marston Parish Council
- Moor Monkton Parish Council
- Lillings Ambo Parish Council
- Claxton & Sandhutton Parish Council
- Sutton-on-the-Forest Parish Council
- Science City York
- First Stop Tourism Partnership

General Consultation Bodies:

- York Science Park
- York Council for Voluntary Service
- Business Link York & North Yorkshire
- National Farmers Union
- Institute of Directors Yorkshire
- York Centre for Safer Communities
- York Racial Equality Network
- York-Heworth Congregation of Jehovah's Witnesses
- York Guild of Building
- Churches Together in York
- Disabled Persons Advisory Group
- CBI
- Yorkshire Business Pride (City Centre Partnership)
- York & North Yorkshire Chamber of Commerce
- York Mosque
- British Chemical Distributors & Traders Association
- Help the Aged
- York England
- Commission for Racial Equality
- York Centre for Safer Communities
- Royal Institute of Chartered Surveyors
- CABE
- York Minster
- Patients Forum
- Forestry Commission
- Centre for Ecology & Hydrology

- Disability Rights Commission
- Equal Opportunities Commission
- York Diocesan Office
- Disabled Persons Transport Advisory Committee

- British Geological Survey
- Community Rangers
- Housing Corporation
- English Partnerships
- York Hospitals NHS Trust

Other Locally Identified Groups:

- York Conservation Trust
- Environment Forum
- York@Large
- Lifelong Learning Partnership
- Without Walls Board
- Raymond Barnes
- O'Neill Associates
- DTZ Debenham Thorpe
- Scarcroft Residents Association
- David Chapman Associates
- Crease Strickland Parkins
- Bramhall Blenkharn Ltd
- Hogg Builders (York) Ltd
- Home Builders Federation
- South Parade Society
- Barrett Homes Ltd (York Division)
- Tang Hall and Heworth Residents
- Shepherd Design Group
- Woodlands Residents Association
- Inclusive City
- Skelton Village Trust
- Farming & Wildlife Advisory Group
- Persimmon Homes (Yorkshire)
- York Residential Landlords Association
- Haxby & Wiggington Youth & Community Association
- Leeman Road Millennium Green Trust
- Joseph Rowntree Housing Trust
- University of York
- National Railway Museum
- York Museums Trust
- Federation of Small Businesses
- York Student Union
- Heslington East Community Forum
- Sandringham Residents Association
- Economic Development Unit
- Walmgate Community Association
- Wheatlands Community Woodland
- Heworth Planning Panel
- Yorkshire Rural Community Council
- Age Concern
- Joseph Rowntree Foundation
- Economic Development Board
- York District Sports Federation
- Passenger Transport Network
- National Federation of Bus Users
- Youth Forum
- York Tourism Bureau
- British Waterways Board (Naburn)
- York & District Citizens Advice Bureau
- Sustrans
- York & District Trade Council
- Healthy City Board
- Safer York Partnership
- Yorkshire Local Councils Association
- River Foss Society

- Micklegate Planning Panel
- York Homeless Forum
- Hull Road Planning Panel
- Community Regeneration York
- Conservation Area Advisory Panel
- Friends of St Nicholas Fields
- Friends of the Earth (York and Ryedale)
- Fishergate Planning Panel
- Ramblers Association York Group
- Dringhouses and Woodthorpe Planning Panel
- River Ouse Action Group
- RSPB (York)
- York Access Group
- York Archaeological Forum
- York Archaeological Trust
- York Architectural and Archaeological Society
- York Civic Trust
- Greenpeace (York)
- York Environment Forum
- Nunnery Residents Association
- York Practice Based Commissioning Group
- York St John College
- Older People's Assembly
- York Open Planning Forum
- Talkabout Panel
- Yorkshire Wildlife Trust
- Guildhall Planning Panel
- Mental Health Forum
- York Natural Environment Panel
- Heslington Village Trust
- York District Sports Federation
- CPRE (York and Selby District)
- York Property Forum
- North Yorkshire Police
- Acomb Planning Panel
- Clifton Planning Panel
- North Yorkshire Fire & Rescue Service
- Meadlands Residents Association
- Fulford Residents Association
- Greenwood Residents Association
- Grosvenor Residents Association
- The Groves Residents Association
- Groves Neighborhood Association
- Kingsway West Residents Association
- Knapton Lane Residents Association
- York Cycle Campaign
- Lindsey Residents Association
- Dringhouses West Community Association
- Millgates Residents Association
- Muncaster Residents Association
- Navigation Residents Association
- Nunnery Residents Association
- Park Grove Residents Association
- Poppleton Ward Residents Association
- St Georges Place Residents Association
- Leeman Road Community Association
- Cambridge Street Residents Association
- St Paul's Square Residents Association
- York Natural Environment Trust
- York Tomorrow
- Yorkshire Planning Aid
- Federation of Residents and Community Associations
- Acomb Green Residents Association
- Bell Farm Residents Association

- Foxwood Residents Association
- BAGNARA
- Dunnington Residents Association
- Carr Residents Association
- Chapelfields Residents Association
- Clementhorpe Community Association
- Clifton Residents Association
- Copmanthorpe Residents Association
- Cornlands Residents Association
- Dodsworth Area Residents Association
- York Georgian Society
- Bishophill Action Group
- York Ornithological Club
- North Yorkshire Forum for Voluntary Organisations
- Gypsy & Traveller Law Reform Coalition
- York TV
- GNER
- BBC Radio York
- North Yorkshire Learning & Skills Council
- Planning Sub-Committee of Huntingdon Parish Council
- York People First 2000
- Sport England
- Yorkshire Naturalists Union
- Active York
- York Practice Based Commissioning Group
- York College - Further & Higher Education
- RTPI Yorkshire
- RIBA Yorkshire
- Yorkshire MESMAC
- National Centre of Early Music
- York Traveller's Trust
- Holgate Planning Panel
- Energy Efficiency Advice Centre
- York Blind and Partially Sighted Society
- Older People's Assembly
- Bootham Planning Panel
- Walmgate Planning Panel
- Campaign for Real Ale
- Bishophill Planning Panel
- Beckfield Planning Panel
- Knavesmire Planning Panel
- Westfield Planning Panel
- Connexions
- The Coal Authority
- The Gypsy Council
- Include Us In - York Council for Voluntary Service
- Higher York Joint Student Union
- The College of Law
- Health & Safety Executive
- Askham Grange
- Civil Aviation Authority
- Freight Transport Association
- Road Haulage Association
- The Crown Estate Office
- National Playing Fields Associations
- Royal Mail Property Holdings
- Monks Cross Shopping Centre
- Askham Bryan College
- York & Selby Carers Centre
- Learning Difficulties Forum
- Transport 2000
- McArthur Glen Designer Outlet
- Boots plc
- Marks & Spencer plc
- Theatre Royal

- Shelter
- Mulberry Hall
- Yorkshire MESMAC
- National Trust
- Institute of Citizenship
- First York
- Land Securities Properties Ltd
- York Racecourse Committee
- Purey Cust Nuffield Hospital
- Stockholm Environment Institute
- Yorkshire Housing
- Garden History Society
- Society for the Preservation of Ancient Buildings
- 20th Century Society
- York Coalition of Disabled People
- Norwich Union Life
- Tuke Housing Association
- Family Housing Association (York) Ltd
- Lions Club
- York Ainsty Rotary Club
- St Sampson's Centre
- Spurriergate Centre
- Newsquest (York) Ltd
- Nestle Rowntree Division
- York Air Museum
- Adams Hydraulics Ltd
- Playing Fields Association (York & North Yorkshire)
- Future Prospects
- Ancient Monuments Society
- Job Centre Plus
- Older Citizens Advocacy York
- Council for British Archaeology
- The Georgian Group
- Victorian Society
- York Women's Aid

Additional Groups / Organisations:

- United Co-operatives Ltd
- The Barton Willmore Planning Partnership Anglia
- Indigo Planning
- Places for People
- Barton Willmore
- York City Centre Churches
- Carter Jonas LLP
- T H Hobson Ltd
- George Wimpey North Yorkshire Ltd
- Stewart Ross Associates
- Drivers Jonas
- Terence O'Rourke
- Rapleys
- MJP
- Action Access A1079
- Geraldeve
- York Housing Association Ltd
- York Carers Together
- Oakgate Group Plc
- York and District Trade Union Council
- Knight Frank
- Tesco Stores Limited
- O'Neil, Beechey, O'Neil Architects
- The Retreat Ltd
- Conservation Areas Advisory Panel
- Npower Renewables
- WM Morrison Supermarkets PLC
- King Sturge

- GVA Grimley LLP
- George Wimpey Strategic Land
- Vangarde
- Colliers CRE
- York Central Landowners Group
- York Green Party
- Clifton Moor Business Association
- Bovis Homes Ltd
- A J M Regeneration Ltd
- White Young Green Planning
- Walton & Co
- NorthCountry Homes Group Ltd
- Plot of Gold Ltd
- The British Wind Energy Association
- The Showmen's Guild of Great Britain
- Storeys:ssp Ltd
- Shirethorn Ltd
- George Wimpey Strategic Land
- Countryside Properties (Northern) Ltd
- The Theatres Trust
- Minster's Rail Campaign
- England & Lyle
- Smiths Gore
- The Inland Waterways Association
Ouse-Ure Corridor Section
- Paul & Company
- Hallam Land Management Ltd
- Local Dialogue LLP
- Northern Planning
- T H Hobson Ltd
- W A Fairhurst & Partners
- I D Planning
- Faber Maunsell
- McCarthy & Stone Ltd
- The Land & Development Practice
- King Sturge LLP
- York Hospitality Association
- The Helmsley Group Ltd
- Spawforth Associates
- The Development Planning Partnership
- Home Housing Association
- **Also consulted were 52 individuals who had requested to be included on the LDF database, and 21 MPs and MEPs.**

Appendix 3: Consultation Work Programme

Week:	Date:	Event:
N/A	29 th May 2006	Radio Interview with BBC Radio York
Week 1	5 th June 2006	All consultation documents and letters distributed.
	6 th June 2006	Consultation officially started.
	7 th June 2006	
	8 th June 2006	
Week 2	9 th June 2006	Radio interview with Minster FM
	12 th June 2006	Inclusive York Forum
	13 th June 2006	York Environment Forum
	14 th June 2006	York Professional Initiative, York Property Forum
Week 3	15 th June 2006	
	16 th June 2006	
	19 th June 2006	
	20 th June	Mobile Exhibition Unit - City Centre
Week 4	21 st June	Mobile Exhibition Unit - City Centre
	26 th June 2006	
	27 th June 2006	Tesco Foyer - Askham Bar, Leaflet distribution
Week 5	28 th June 2006	Workshop 1 – Sustainable Forms of Transport
	29 th June 2006	
	30 th June 2006	Tesco exit foyer Clifton Moor
	3 rd July 2006	Workshop 2 – Economic Wellbeing through sustainable economic growth
Week 6	4 th July 2006	
	5 th July 2006	
	6 th July 2006	Workshop 3 – Community Development Needs
	7 th July 2006	
Week 7	10 th July 2006	
	11 th July 2006	Workshop 4 – Sustainable Location of Development
	12 th July 2006	York Open Planning Forum
	13 th July 2006	
Week 7	14 th July 2006	
	19 th July	Workshop 5 – A Quality Environment and Sustainable Design.
	20 th July 2006	
	21 st July 2006	Consultation officially ended.



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